



Data Protection Policy

(in line with The UK General Data Protection Regulations UK-GDPR)

Last Reviewed	September 2024
Next Review Date	November 2026
Ratified by the Trustee Board	November 2025

DATA PROTECTION POLICY

1 Aim

This policy sets out how Horsforth School collects, uses, stores, shares, and protects personal data in line with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**. We are committed to protecting the rights and freedoms of all individuals whose personal data we hold, including pupils, parents/carers, staff, trustees, contractors, and visitors.

2 Context

Horsforth School operates within guidance and procedures set out by the Department for Education (DfE).

3 Legal Basis for Processing

The legal basis for processing data for schools is either:

- We need to comply with the law
- We need to use it to carry out a task in the public interest (in order to provide you with an education)

Sometimes, we may also use personal information where:

- We have been given permission to do so
- We need to protect a legitimate interest

4 Review

This policy will be reviewed annually by the Board of Trustees to ensure it is still fit for purpose. Circumstances may require more frequent modifications.

5 Author

This policy has been reviewed by LVR in November 2025.

6 Procedures

Procedures to support this policy are appended as follows:

Appendix 1 - Procedures

Appendix 2 – Data Breach Reporting Form

Appendix 3 – Guidelines

Appendix 4 – Data Protection Information Request Form

Appendix 5 – Freedom of Information Procedures

Appendix 6 – Retention Schedule

Appendix I: Procedures to support the Policy

1. Introduction

Horsforth School is committed to being transparent about how it collects and uses the personal data of its workforce and students, and to meeting its data protection obligations. This policy sets out our commitment to data protection, and individual rights and obligations in relation to personal data and is tailored to comply with the General Data Protection Regulation ((EU) 2016/679) (UK-GDPR) and the Data Protection Act 2018.

Changes to data protection legislation shall be monitored and implemented in order to remain compliant with all requirements.

This policy applies to the personal data of job applicants, employees, (workers, contractors, volunteers, apprentices) and former employees, and to students and former students of Horsforth School.

Horsforth School believes that protecting the privacy of our staff and students and regulating their safety through data management, control, and evaluation is vital to whole-school and individual progress. The school collects personal data from students, parents/carers, and staff and processes it in order to support teaching and learning, monitor and report on student and teacher progress, and strengthen our pastoral provision.

We take responsibility for ensuring that any data that we collect and process is used correctly and only as is necessary, and the school will keep parents/carers fully informed of the how data is collected, what is collected, and how it is used. National curriculum results, attendance and registration records, special educational needs data, and any relevant medical information are examples of the type of data that the school needs. Through effective data management we can monitor a range of school provisions and evaluate the wellbeing and academic progression of our school body to ensure that we are doing all that we can to support both staff and students. The legal basis for processing data is that it is necessary to carry out these tasks in the public interest.

Within Horsforth School the Director of HR is responsible for data protection compliance and is the named Data Protection Officer (DPO). Questions about this policy, or requests for further information, should be directed to the DPO.

Horsforth School is also committed to ensuring that its staff are aware of data protection policies, legal requirements and ensuring adequate training is provided. The requirements of this policy are mandatory for all staff employed by the school and any third party contracted to provide services within the school.

2. Our promise

All data within the School shall be identified as personal, sensitive or both to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the individuals to whom it relates.

In line with the Data Protection Act 2018, and following principles of good practice when processing data, all staff within the School will:

- ensure that data is fairly and lawfully processed
- process data only for limited purposes
- ensure that all data processed is adequate, relevant and not excessive
- ensure that data processed is accurate
- not keep data longer than is necessary
- process the data in accordance with the data subject's rights
- ensure that data is secure
- ensure that data is not transferred to other countries without adequate protection.

3. Fair Processing / Privacy Notice:

We shall be transparent about the intended processing of data and communicate these intentions via notification to staff, parents/carers and students prior to the processing of individual's data. Notifications shall be in accordance with ICO guidance and, where relevant, be written in a form understandable by those defined as 'Children' under the legislation.

There may be circumstances where the school is required either by law or in the best interests of our students or staff to pass information onto external authorities, for example our local authority, Ofsted, or the department of health. These authorities are up to date with data protection law and have their own policies relating to the protection of any data that they receive or collect.

The intention to share data relating to individuals to an organisation outside of the School shall be clearly defined within notifications and details of the basis for sharing given. Data will only be shared with external parties in circumstances where it is a legal requirement to provide such information.

Under no circumstances will the school disclose information or data:

- that would cause serious harm to the child or anyone else's physical or mental health or condition
- indicating that the child is or has been subject to child abuse or may be at risk of it, where the disclosure would not be in the best interests of the child
- that would allow another person to be identified or identifies another person as the source, unless the person is an employee of the school or local authority or has given consent, or it is reasonable in the circumstances to disclose the information without consent. The exemption from disclosure does not apply if the information can be edited so that the person's name or identifying details are removed

- in the form of a reference given to another school or any other place of education and training, the child's potential employer, or any national body concerned with student admissions.

4. Roles and Responsibilities

The Board of Trustees

- Ensures the organisation complies with data protection obligations.
- Approves and reviews this policy.

Accounting Officer / Headteacher

- Ensures compliance across the school.
- Supports staff to follow the policy.

Data Protection Officer (DPO)

Name: Lauren Robinson

Email: info@horsforthschool.org

Contact: 0113 2265454

Responsibilities include:

- Advising on data protection obligations
- Monitoring compliance
- Leading training and audits
- Acting as point of contact for individuals and the ICO

All staff must:

- Read and comply with this policy
- Complete required training
- Report personal data breaches immediately
- Follow procedures for secure data handling

Individuals are responsible for helping to keep their personal data up to date. Employees of Horsforth School are responsible for ensuring they update their personal data using the school payroll system, Itrent.

Some staff may have access to the personal data of other individuals, other staff and students in the course of their employment or placement. Where this is the case, we expect staff to help meet our data protection obligations.

Staff who have access to personal data are required:

- to access only data that they have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside the organisation) who have appropriate authorisation;

- to keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- not to remove personal data, or devices containing or that can be used to access personal data, from the organisation's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device; and
- not to store personal data on local drives or on personal devices that are used for work purposes.

Failing to observe these requirements may amount to a disciplinary offence. Significant or deliberate breaches of this policy, such as accessing employee or student data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

Staff personal data gathered during the employment or placement, is held in an individual's personnel file (in hard copy and electronic format), and on HR systems. The periods for which this information is held will be contained in privacy notices. Horsforth School will keep a record of its processing activities in respect of personal data in accordance with the requirements of the Data Protection Act 2018 and UK-GDPR.

5. Data Security:

Horsforth School takes the security of personal data seriously. The School has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties.

These measures include:

- Secure passwords and multi-factor authentication
- Role-based access controls
- Encrypted storage and backup
- Locked filing systems
- Secure disposal of documents and devices
- Staff training and monitoring

In order to assure the protection of all data being processed and inform decisions on processing activities, we shall undertake an assessment of the associated risks of proposed processing and equally the impact on an individual's privacy in holding data related to them. Risk and impact assessments shall be conducted in accordance with guidance given by the ICO performance.

Where we engage third parties to process personal data on our behalf, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Facial Recognition and Biometric Data

Horsforth School may use facial recognition or other biometric technologies only where it is clearly necessary, lawful, and proportionate, and only after a Data Protection Impact Assessment (DPIA) has been completed and approved by the Data Protection Officer (DPO).

Facial recognition data is classed as “special category biometric data” under the UK GDPR because it can uniquely identify an individual. As a result, additional safeguards apply.

We will only process facial recognition data where:

- Explicit consent has been given by the data subject (staff or visitors), AND, for pupils,
- Parental consent has been obtained (as required under the Protection of Freedoms Act 2012, Chapter 2).

Consent must be:

- Freely given
- Specific
- Informed
- Unambiguous
- Capable of being withdrawn at any time

If consent is not given or is withdrawn, Horsforth School must provide an alternative method of access/identification.

Facial recognition may only be used for:

- Access control (e.g., entry systems)
- Identity management
- Registration/attendance systems (subject to DPIA requirements)
- Catering/payment systems where approved

It must **not** be used for surveillance, behaviour tracking, automatised decision-making, or monitoring pupils beyond its stated purpose.

Any new use must be authorised by:

- The DPO
- The Headteacher
- The Trust Board

Biometric templates must:

- Be stored in encrypted, non-reversible format

- Retain only data strictly necessary for identification
- Be deleted immediately when no longer required or when consent is withdrawn

Retention periods will be set out in the Horsforth **Retention Schedule** and supporting DPIA.

To protect biometric data, we apply enhanced security controls, including:

- Encryption at rest and in transit
- Access restrictions limited to authorised staff
- Strict user authentication
- Secure audit logging
- Regular security testing
- Supplier compliance checks under Article 28 UK GDPR

Facial recognition data must **never** be used for any purpose other than the one for which consent was obtained.

Biometric data will **not** be shared with third parties unless:

- It is essential for the functioning of the system,
- A GDPR-compliant data processing agreement is in place,
- The DPO has approved the arrangement,
- Data remains within the UK or is subject to appropriate safeguards for overseas transfers.

Biometric data will **never** be shared with law enforcement without a lawful request.

Individuals have the right to:

- Withdraw consent at any time
- Request access to their biometric data
- Request deletion of biometric data
- Object to processing
- Request an alternative means of identification

Horsforth School must ensure no pupil or staff member suffers any detriment if they choose not to use the system.

All staff operating or managing facial recognition systems have/will received:

- Data protection training

- Technical training on secure and compliant system use
- Annual refreshers or additional training when systems change

Subject Access Request – Requesting Information

All individuals including students whose data is held by Horsforth School, have a legal right to request access to such data or information about what is held. Any such request will normally be responded to within one month of the date the request was received. Requests can be made verbally or in writing should be passed immediately to the Data Protection Officer.

Educational record

A student can request, verbally or in writing, to see their educational record. This record may include:

- a statement of special educational needs
- their personal education plan (PEP) – the document provided by social care to the school if a child is looked-after
- a record of information kept by the school, for example relating to behaviour or family background, which:
 - is processed by or on behalf of the board of Trustees or a teacher at any maintained or special school
 - relates to a past or present pupil
 - originates from any employee at the LA that maintains the school, or is supplied by or on behalf of them
 - originates from any teacher or other employee at the student’s school or former school or is supplied by or on behalf of them
 - originates from the student to whom the record relates or the student’s parent/carer, or is supplied by or on behalf of them

A parent/carer can request to see their child’s educational record, or request it on behalf of their child, in writing. Parents of students at this school do not have an automatic right to access their child’s educational record. The school will decide on a case-by-case basis whether to grant such requests, and we will bear in mind guidance issued from time to time from the Information Commissioner’s Office (ICO).

The information will be presented within 15 days of the request. If there is a cost of retrieving the information, for example if a copy must be made, a charge may be made to cover the amount that it will cost but no more. Other than this, there will be no charge for the information requested.

Staff

We are legally obliged to protect certain information on our staff. School staff have a right to see records of their personal information. Staff who wish to access this information can make a subject access request under the Data Protection Act 2018. Disclosure of these records will be made once third-party information has been removed in accordance with the Data Protection Act 2018.

If an individual makes a subject access request, we will provide the following information:

- whether or not the data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual;
- to whom the data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers;
- for how long the personal data is stored (or how that period is decided);
- their rights to rectification or erasure of data, or to restrict or object to processing;
- the right to complain to the Information Commissioner if they believe Horsforth School has failed to comply with their data protection rights;
- a copy of the personal data undergoing processing.

If a subject access request is manifestly unfounded or excessive, we may choose not to comply with it or alternatively, charge a fee, which will be based on the administrative cost of responding to the request. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which the organisation has already responded. If an individual submits a request that is unfounded or excessive, we will notify them directly that this is the case and whether or not we will respond to it.

6. Other rights

Individuals including students have a number of other rights in relation to their personal data. They can require us to:

- rectify inaccurate data;
- stop processing or erase data that is no longer necessary for the purposes of processing;
- stop processing or erase data if the individual's interests override the legitimate grounds for processing data;
- stop processing or erase data if processing is unlawful; and
- stop processing data for a period if data is inaccurate or if there is a dispute about whether or not the individual's interests override our legitimate grounds for processing data.

To ask the Horsforth School to take any of these steps, the individual should send the request to the Director of HR and data protection officer.

7. Access to data and disclosure

Third parties

Personal data about students will not be disclosed to third parties without the consent of the student's parent or carer, unless it is obliged by law or in the best interest of the child. Data may be disclosed to the following third parties without consent:

- **Other schools**

If a student transfers from Horsforth School to another school, their academic records and other data that relates to their health and welfare will be forwarded onto the school. This will support a smooth transition from one school to the next and ensure that the student is provided for as is necessary. It will aid continuation which should ensure that there is minimal impact on the child's academic progress as a result of the move.

- **Examination authorities**

This may be for registration purposes, to allow the students at our school to sit examinations set by external exam bodies.

The information supplied to the school will be used by the Skills Funding Agency, an executive agency of the Department for Education (DfE), to issue students with a Unique Learner Number (ULN), and to create a Personal Learning Record. For more information about how information is processed and shared students can refer to the Extended Privacy Notice available on Gov.UK.

- **Health authorities**

As obliged under health legislation, the school may pass on information regarding the health of children in the school to monitor and avoid the spread of contagious diseases in the interest of public health.

- **Police and courts**

If a situation arises where a criminal investigation is being carried out we may have to forward information on to the police to aid their investigation. We will pass information onto courts as and when it is ordered.

- **Social workers and support agencies**

In order to protect or maintain the welfare of our students, and in cases of child abuse, it may be necessary to pass personal data on to social workers or support agencies.

- **Educational division**

Schools may be required to pass data on in order to help the government to monitor the national educational system and enforce the Education Act.

School staff

School staff will have restricted access to students' personal data and will be given access only on a 'need to know' basis in the course of their duties within the school. All staff are well informed of the Data Protection Act and how their conduct must correspond with this. Staff will use data only for the purpose of which it was collected, and any staff that are found to be acting intentionally in breach of this will be disciplined in line with the seriousness of their misconduct.

8. Retention and location of information and data

Hard copy data, records, and personal information should be stored out of sight and in a locked cupboard no matter what format it is in. The only exception to this is medical information that may require immediate access during the school day.

Electronic records – access will only be given to folders where there is a legitimate business reason to have access.

Sensitive or personal information and data should ideally not be removed from the school site; however, the school acknowledges that some staff may need to transport data between the school and their home in order to access it for work in the evenings and at weekends. This

may also apply in cases where staff have offsite meetings, or are on school visits with students. The following guidelines are in place for staff in order to reduce the risk of personal data being compromised:

- Paper copies of data or personal information should not be taken off the school site. If these are misplaced they are easily accessed. If there is no way to avoid taking a paper copy of data off the school site, the information should not be on view in public places, or left unattended under any circumstances.
- Unwanted paper copies of data, sensitive information or pupil files should be shredded. This also applies to handwritten notes if the notes reference any other staff member or student by name.
- Care must be taken to ensure that printouts of any personal or sensitive information are not left in printer trays or photocopiers.
- If information is being viewed on a PC, staff must ensure that the window and documents are properly shut down before leaving the computer unattended. Sensitive information should not be viewed on public computers.
- If it is necessary to transport data away from the school, it should be downloaded onto a USB stick. The data should not be transferred from this stick onto any home or public computers. Work should be edited from the USB, and saved onto the USB only. USB sticks that staff use must be password protected.
- All documents sent electronically should at least be password protected.

These guidelines are clearly communicated to all school staff, and any person who is found to be intentionally breaching this conduct will be disciplined in line with the seriousness of their misconduct.

Retention Guidelines

Under the Freedom of Information Act 2000, schools are required to maintain a retention schedule, listing the record series which the school creates in the course of its business. The retention schedule lays down the length of time over which the record needs to be retained, and the action which should be taken when it is of no further administrative use.

The retention schedule lays down the basis for normal processing under the General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000.

An example of this schedule can be found in Appendix 6.

9. Photographs and Video:

Images of staff and students may be captured at appropriate times and as part of educational activities for use in school only. Unless prior consent from parents/students/staff has been given, the school shall not utilise such images for publication or communication to external sources. It is the school's policy that external parties (including parents/carers) may not capture images of staff or pupils during such activities without prior consent.

Where CCTV is used:

- Signs are clearly displayed
- Footage is stored securely
- Access is restricted
- Footage is retained for a limited period unless required for an investigation

10. Retention of data

Horsforth School will not keep personal data on students for any longer than is reasonably necessary. Information such as statistical data, and information that is collected to be kept as part of school records, will be kept by the school even after the child leaves.

It is very important that all examination results certificates and records indicating the progress of a student are safely kept by their parents/carers as the school cannot guarantee that this information will be kept indefinitely by the school.

The school cannot guarantee that any information will be kept by the school indefinitely, although records are usually kept for a period of 5 years after the child has left the school. All student and staff records will be retained in line with the Information and Records Management Society Retention Guidelines for Schools.

Horsforth School recognises that the secure disposal of redundant data is an integral element to compliance with legal requirements and an area of increased risk. All data held in any form of media (paper, tape, electronic) shall only be passed to a disposal partner with demonstrable competence in providing secure disposal services. All data shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process. Horsforth School has identified a qualified source for disposal of IT assets and collections.

11. Data Breaches

A breach must be reported **immediately** to the DPO. If the breach is likely to result in risk to individuals, the DPO will notify the **ICO within 72 hours** and individuals where required.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, we will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures we have taken as a result.

Appendix 2: Data Breach Reporting Form

Date:		Person reporting breach		
Outline of Breach				
Which data subjects were involved				
Data Type involved				
Phone/email sent to DPO	Yes/No	Is this high risk?	Please explain	Report to ICO Yes/No
Date reported to				
Actions Taken				
Preventative actions taken				
Notes				
Signed off by DPO			Date	

Appendix 3: Guidelines

Under the Data Protection Act, you have the right to ask for a copy of the information we hold about you. You are only entitled to make a request for personal information on behalf of another living adult if you have authorisation to do this.

Parents or guardians are allowed to make a request for personal information on behalf of their children, although if the children are aged 12 or over then they must give their permission for this.

We need various information from you to help us find the information you are interested in and to deal with your request as quickly as possible. We also need you to prove who you are, as we have to be sure that we're giving your personal information out to the correct person. The form below sets out exactly what information we need from you and what you have to give us to prove your identity.

Your responsibilities are

- You provide this request verbally or in writing (using the form – Appendix 4)
- You need to establish your identity by providing suitable ID
- You should help us to find the information by specifying what data you would like to see.

Our responsibilities are

- To acknowledge your request
- To inform you if we have any personal data about you and provide it if we have;
- To reply within 1 month.

Horsforth School does not charge any fee for a Subject Access Request, unless the request is deemed to be manifestly unfounded or excessive, in which case Horsforth School may charge a reasonable fee (taking into account the administrative costs of providing the information or taking the action requested).

Appendix 4: Data Protection Information Request Form

1. Who is the data subject?

Mr/Mrs/Miss/Ms/other _____

Date of Birth _____

Address _____

Postcode _____

Telephone No _____

Email Address _____

2. Has the Data subject ever been an employee of Horsforth School?

Yes

No

Don't know

3. What are your Personal Details?

a. Are you the data subject?

Yes If you answered 'Yes', go straight to Question 5

No If you answered 'No' please provide the information below and go to Question 4

Data Subject's full name

Mr/Mrs/Miss/Ms/other _____

Date of Birth _____

Address _____

Postcode _____

Telephone No _____

4. If you are NOT the data subject, state your relationship to them?

Full Valid Current Passport

Gas, electricity, water or telephone bill in the Data Subject's name for the last quarter

Council Tax demand in the Data Subject's name for the last quarter

Bank, building society or credit card statement in the Data Subject's name for the last quarter

Letter to Data Subject from solicitor/social worker/probation officer in the last Quarter

7. Formal Declaration

In exercise of the right granted to me under the terms of the Data Protection Act 2018, I request that you provide me with a copy of the Personal Data about the Data Subject which you process for the purposes I have indicated above.

I confirm that this is all of the Personal Data to which I am requesting access. I also confirm that I am either the Data Subject, or am acting on their behalf

Signed _____

Print Name _____

Date _____

Make sure you have:

- (a) Completed this form
- (b) Signed the declaration above
- (c) Enclosed photocopies of proof of identification document

Please send them to:

Lauren Robinson – Data Protection Request, Horsforth School, Lee Lane East, Horsforth, Leeds LS18 5RF

We recommend that you send your form and documents by secure method e.g. Recorded Delivery
Note: The period of one month in which Horsforth School must respond to the request will not commence until it is satisfied upon these matters.

Horsforth School does not currently charge any fee for a Subject Access Request, unless the request is deemed to be manifestly unfounded or excessive, in which case Horsforth School may charge a reasonable fee (taking into account the administrative costs of providing the information or taking the action requested).

Appendix 5: Freedom of Information Procedures

Background and Core Procedures

1. Introduction

Horsforth School is committed to the Freedom of Information Act 2000 and to the principles of accountability and the general right of access to information, subject to legal exemptions. This Policy outlines the School's response to the Act and a framework for managing requests.

2. Background

The Freedom of Information Act 2000 (Fol Act) came fully into force on 1 January 2005. Under the Act, any person has a legal right to ask for access to information held by the School. They are entitled to be told whether the School holds the information, and to receive a copy, subject to certain exemptions.

The information which the School routinely makes available to the public is included in the Publication Scheme. Requests for other information should be dealt with in accordance with the statutory guidance. While the Fol Act assumes openness, it recognises that certain information is sensitive. There are exemptions to protect this information.

Requests must be made in writing, (including email or fax), and should include the enquirers name and correspondence address, and state what information they require. Horsforth School has a duty to respond to all requests, specifically confirming whether or not the information is held and supplying any information that is held, except where exemptions apply. A response will be provided in 20 days excluding school holidays.

3. Scope

The Fol Act joins the UK-GDPR (UK-GDPR) and the Environmental Information Regulations as legislation under which anyone is entitled to request information from the School.

Requests for personal data are still covered by the UK-GDPR. (UK-GDPR). Individuals can request to see what information the School holds about them. This is known as a Subject Access Request, and must be dealt with accordingly.

Requests for information about anything relating to the environment – such as air, water, land, the natural world or the built environment and any factor or measure affecting these – are covered by the Environmental Information Regulations (EIR). They also cover issues relating to Health and Safety.

If any element of a request to the school includes personal or environmental information, these will be dealt with under UK-GDPR or EIR. Any other information is a request under Fol, and will be dealt with accordingly.

4. Obligations and Duties

The School recognises its duty to

- Provide advice and assistance to anyone requesting information. Horsforth School will respond to straightforward verbal requests for information, and will help enquirers to put more complex verbal requests into writing so that they can be handled under the FoI Act.
- Tell enquirers whether or not the School holds the information they are requesting, and provide access to the information we hold in accordance with the procedures laid down below.

5. Publication Scheme

Horsforth School has adopted the Model Publication Scheme for Schools approved by the Information Commissioner. The Publication Scheme and the materials it covers will be readily available on our School website, www.horsforthschool.org

6. Dealing with Requests

We will respond to all requests in accordance with the procedures laid down below.

7. Exemptions

Certain information is subject to either absolute or qualified exemptions.

Should the School wish to apply a qualified exemption to a request, it will invoke the public interest test procedures to determine if public interest in applying the exemption outweighs the public interest in disclosing the information.

Horsforth School will maintain a register of requests where we have refused to supply information, and the reasons for the refusal. The register will be retained for by the Director of HR for 5 years.

8. Public Interest Test

Unless it is in the public interest to withhold information, it has to be released. We will apply the public interest test before any qualified exemptions are applied.

9. Charging

Horsforth School reserves the right to refuse to supply information where the cost of doing so exceeds the statutory maximum, currently £450

Trustees may choose to charge a fee for complying with requests for information under FOI. The fees must be calculated according to FoI regulations and the person notified of the charge before information is supplied.

10. Responsibilities

The Trustees of Horsforth School has delegated the day-to-day responsibility for compliance with the FoI to the Head Teacher. Please note any FoI requests received may be forwarded on to the Information Access Team, Children Services, Leeds City Council, for guidance.

11. Complaints

Any comments or complaints will be dealt with through the School's normal complaints procedure.

Appeals against the outcome of an internal complaint investigation should be made in writing to the Information Commissioner's Office (ICO). They can be contacted at:

FOI/EIR Complaints Resolution
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire. SK9 5AF

Procedure for dealing with requests

To handle a request for information the Trustees or delegated person will ask themselves a series of questions. These are set out below

Is it a FOI request for information?

A request for information may be covered by one, or all, of three information rights:

- UK-GDPR enquiries (or subject access requests) are ones where the enquirer asks to see what personal information the school holds about the enquirer. If the enquiry is a Data Protection request, follow your existing school UK-GDPR guidance.
- Environmental Information Regulations enquiries are ones which relate to air, water, land, natural sites, built environment, flora and fauna, and health, and any decisions and activities affecting any of these. These could therefore include enquiries about recycling, phone masts, school playing fields, car parking etc. If the enquiry is about environmental information, follow the guidance on the ICO's website [here](#) or the DEFRA website [here](#).
- FOI enquiries are concerned with all other information and the reasoning behind decisions and policies. The request does not have to mention the FOI Act. All requests for information that are not data protection or environmental information requests are covered by the FOI Act.

Is this a valid FOI request for information?

An FOI request should:

be **in writing**, including email or FAX; **state the enquirer's name and correspondence address** (email addresses are allowed);

describe the information requested - there must be enough information to be able to identify and locate the information; and not be covered by one of the other pieces of legislation.

Verbal enquiries are not covered by the FOI Act. Such enquiries can be dealt with where the enquiry is relatively straightforward and can be dealt with satisfactorily. However, for more complex enquiries, and to avoid disputes over what was asked for, you should ask the enquirer to put the request in writing or email, when the request will become subject to FOI.

Does the school hold the information?

“Holding” information means information relating to the business of the school: the school has **created**, or the school has **received from another** body or person, or **held by another** body **on the school’s behalf**.

Information means both hard copy and digital information, including email.

Has the information requested already been made public?

If the information requested is already in the public domain, Horsforth School will direct the enquirer to the information and explain how to access it.

Is the request vexatious or manifestly unreasonable or repeated?

The FoI Act states that there is no obligation to comply with vexatious requests. This is taken to mean a request which is designed to cause inconvenience, harassment or expense rather than to obtain information, and would require a substantial diversion of resources or would otherwise undermine the work of the school.

Could a third party’s interests be affected by disclosure?

Consultation of third parties may be required if their interests could be affected by release of the information requested, and any such consultation may influence the decision.

Consultation will be necessary where:

- disclosure of information may affect the legal rights of a third party, such as the right to have certain information treated in confidence or rights under Article 8 of the European Convention on Human Rights;
- the views of the third party may assist you to determine if information is exempt from disclosure, or
- the views of the third party may assist you to determine the public interest.

Does an exemption apply?

The presumption of the legislation is that you will disclose information unless the FoI Act provides a specific reason to withhold it.

Is the request for personal information?

Personal information requested by the subject of that information is exempt under the FoI Act as such information is covered by the UK-GDPR. Individuals must, therefore, continue to make a ‘subject access request’ under the UK-GDPR if they wish to access such information.

Do the details contain personal information?

Personal information requested by third parties is also exempt under the FoI Act where release of that information would breach the UK-GDPR. If a request is made for a document (e.g. Trustees minutes) which contains personal information whose release to a third party

would breach the UK-GDPR, the document may be issued by blanking out the relevant personal information.

What is the time limit for replying to the enquirer?

Compliance with a request must be prompt and certainly within the legally prescribed limit of 20 working days, excluding school holidays. The response time starts from the time the request is received. If further information has been requested by the enquirer, the 20 days start time begins when this further information has been received.

If a qualified exemption applies and more time is required to consider the public interest test, the school will reply within the 20 days stating that an exemption applies but include an estimate of the date by which a decision on the public interest test will be made.

If there is to be a charge made the time period stops until payment is received and then continues again once payment has been received.

What if a request is refused?

If the information is not to be provided, the person dealing with the request must immediately contact the person in the school with delegated responsibility for FOI to ensure that the case has been properly considered and the reasons for refusal are sound. If it is decided to refuse a request, a refusals notice will be issued confirming the following:

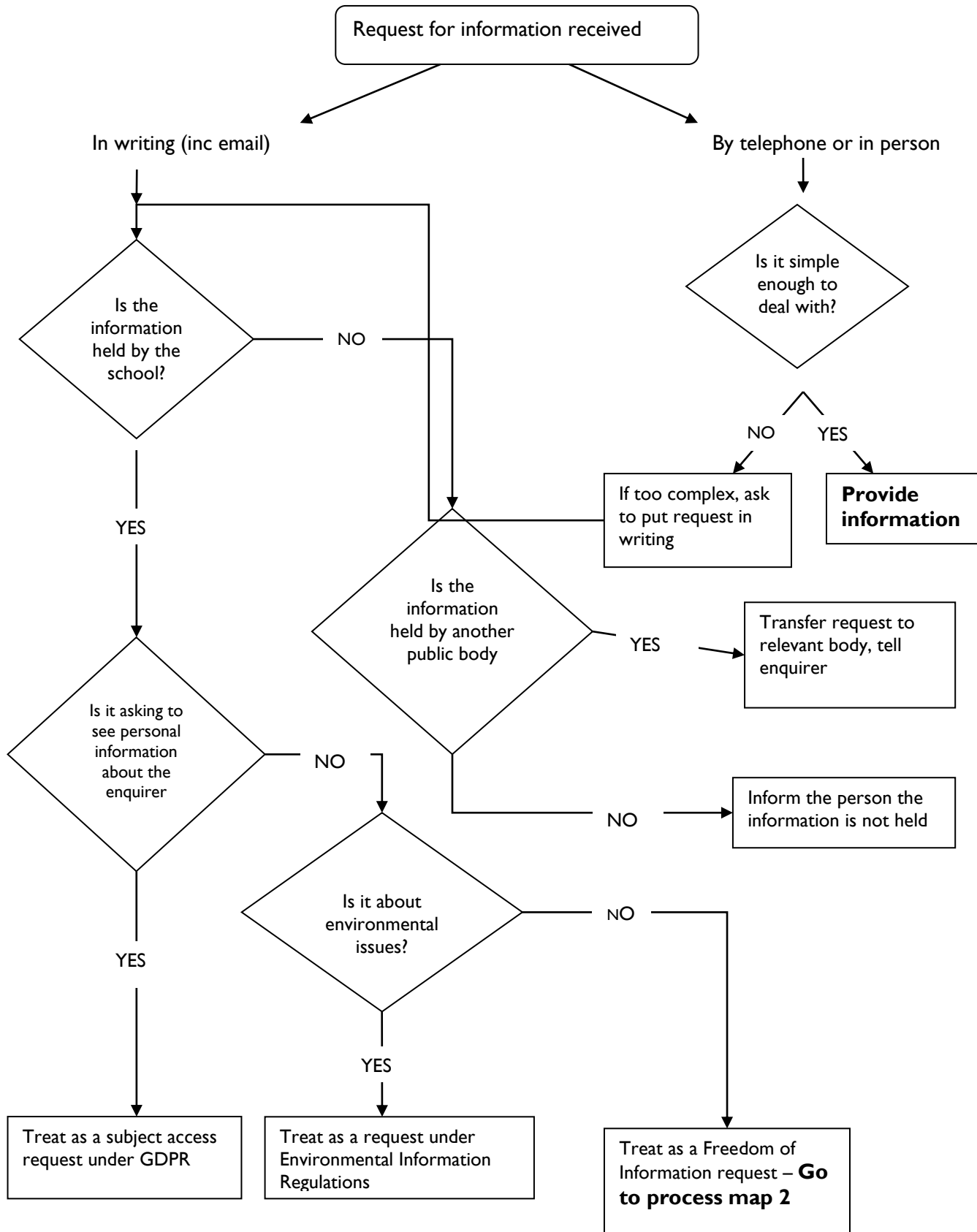
- the fact that the responsible person cannot provide the information asked for;
- which exemption(s) you are claiming apply;
- why the exemption(s) apply to this enquiry (if it is not self-evident);
- reasons for refusal if based on cost of compliance
- in the case of non-absolute exemptions, how you have applied the public interest test, specifying the public interest factors taken into account before reaching the decision
- reasons for refusal on vexatious or repeated grounds
- the internal complaints procedure.

For monitoring purposes and in case of an appeal against a decision not to release the information or an investigation by the Information Commissioner, the responsible person will keep a record of all enquiries where all or part of the requested information is withheld and exemptions are claimed. The record must include the reasons for the decision to withhold the information. Records will be retained for 5 years. Records will not be retained where you have supplied the information requested.

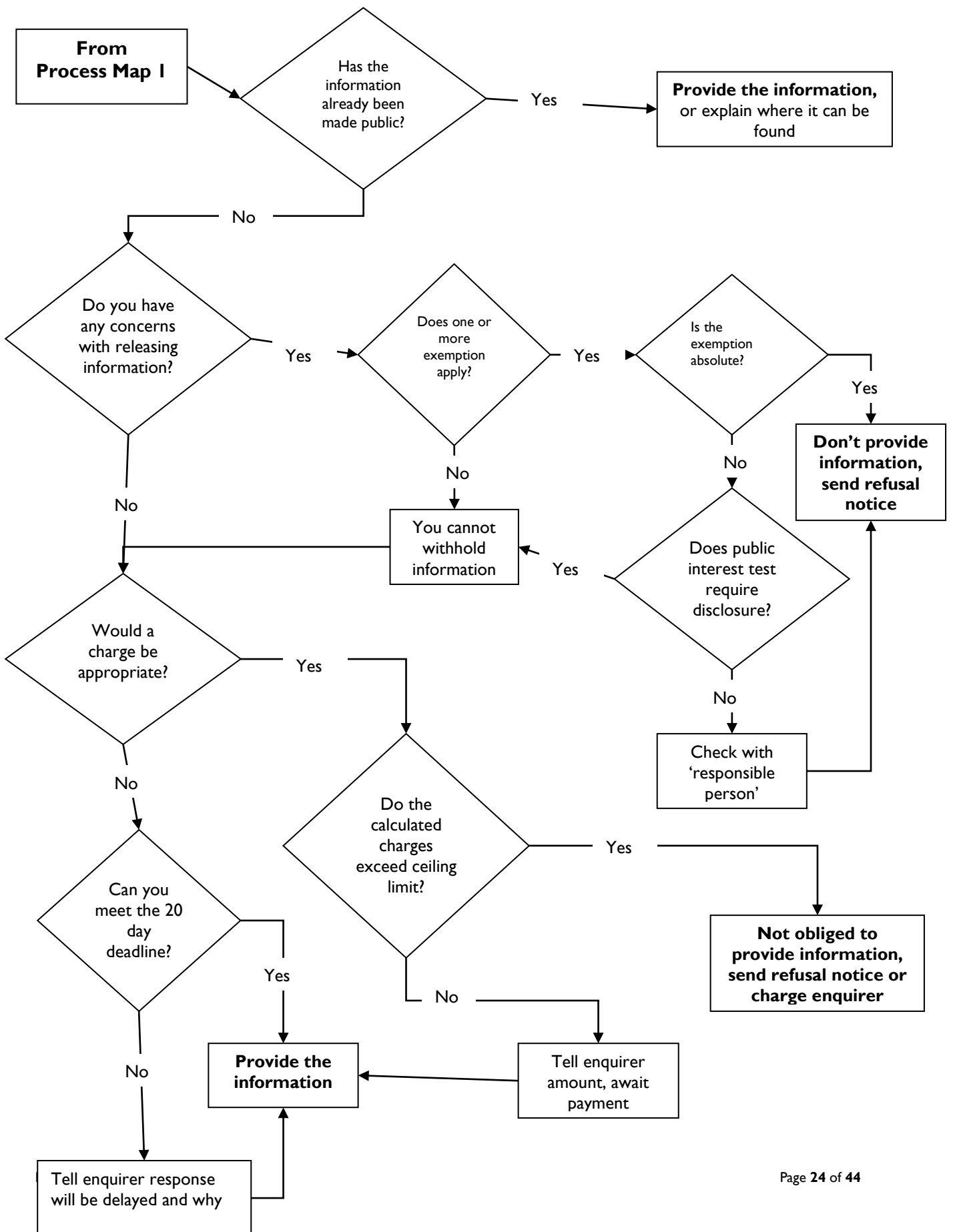
Feedback and Complaints

If you are not satisfied with the assistance that you get or if we have not been able to resolve your complaint and you feel that a formal complaint needs to be made then this should be addressed to the Information Commissioner's Office. This is the organisation that ensures compliance with the Freedom of Information Act 2000 and that deals with formal complaints. They can be contacted at FOI Compliance Team (complaints), Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Process Map (1) for Dealing with Requests



Process Map (2) for Dealing with Requests



Appendix 6: Retention Schedule

Definitions:

DPA – Data Protection Act

Permanent – permanent preservation means preservation for an indefinite time of the documents having the last enduring value.

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; when no longer required	
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 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 from electronic systems	<i>*If meeting deals with confidential staff issues</i>
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	
1.5	Governor election voting forms	Yes		Date of election + 6 months	Destroy Destroy as confidential	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
					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	
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*	
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*	<i>It may be appropriate to review for further retention in the case of contentious disputes</i>
1.10	Annual parents' meetings			Permanent	Permanent, or as below Retain in school for 6 years from date of meeting then: Minutes and reports: All other records: destroy as confidential waste or delete securely from electronic systems*	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
2.0	Management and Administration					
2.1	Log books of activity in the school, maintained by teachers	Yes ¹		Permanent	Permanent Retain in school whilst operationally required	
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
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: 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	
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*	
2.6	Professional development plans	Yes		Closure of file + 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
2.7	School development plans	No		Retain in school for closure of file + 6 years	archive	
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	archive	
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	archive	
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	
2.13	PTA (Parent Teacher Association) / old pupils' associations records	Yes		Retain in school for current academic year + 6 years	archive or as below Minutes, newsletters and membership registers: All other records: destroy as confidential waste or delete securely from electronic systems	

LA (Local Authority)					
Secondary transfer sheets (primary)	Yes		Current academic year + 2 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
Attendance returns	Yes		Current academic year + 1 year	Destroy Destroy as confidential waste or delete securely from electronic systems	
Circulars from the LA	No		Whilst operationally required	Destroy Destroy as confidential waste or delete securely from electronic systems	
DfE (Department for Education)					
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	
OFSTED reports	No		Retain in school while current; replace former report with any new inspection report	Permanent *	*Reports should be available on the OFSTED website. Retain at least two previous reports if not available online.
OFSTED-related papers	No		Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
Returns to the DfE	No		Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
Circulars from the DfE	No		Whilst operationally required	Destroy Destroy as confidential waste or delete securely from electronic systems	
Pupils					
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	

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
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
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	<u><i>If held electronically, a printout should be made at least annually. Any corrections made to electronic data should be clearly shown in the printout.</i></u>
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	
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	
Absence books	Yes		Current year + 6 years from last entry in book	Destroy Destroy as confidential waste or delete securely from electronic systems	
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	

<p>Child protection files</p> <ul style="list-style-type: none"> Primary 	<p>Yes</p>	<p>DfE 'Keeping Children Safe in Education' (2016), Annex B, p.61</p>	<p>Retain while the pupil remains at the primary school*</p>	<p>Follow guidelines in 5.13 for pupils transferring to another school</p>	<p>*CP information must be kept separate from the main pupil file.</p> <p>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</p>
<p>Child protection files</p> <ul style="list-style-type: none"> Secondary 	<p>Yes</p>	<p>DfE 'Keeping Children Safe in Education' (2016), Annex B, p.61</p>	<p>Date of birth of pupil + 25 years*</p>	<p>Destroy or as below If the child leaves the school: follow guidelines in 5.13 for pupils transferring to another school</p> <p>If the retention period is reached: destroy as confidential waste or delete securely from electronic systems</p>	<p>*CP information must be kept separate from the main pupil file.</p> <p>Both the educational record and CP information must be retained for 25 years from DOB.</p> <p>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.</p>

<p>Pupil's educational record (pupil file)</p> <p>Pupils with Special Educational Needs (SEN)</p> <ul style="list-style-type: none"> • 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	<p>Includes:</p> <ul style="list-style-type: none"> • SEN reviews • Individual Education Plans (IEPs) / pupil profiles • Health questionnaires • Parental consent forms • Health care plans • Records of medicine administered
<p>Pupil's educational record (pupil file)</p> <p>Pupils with Special Educational Needs (SEN)</p> <ul style="list-style-type: none"> • Secondary 	Yes		Date of birth of pupil + 22 years*	<p>Destroy or as below</p> <p>If the child leaves the school: follow guidelines in 5.13 for pupils transferring to another school</p> <p>If the retention period is reached: destroy as confidential waste or delete securely from electronic systems</p>	<p>*Unless child protection applies, in which case retain for 25 years from DOB; see 5.10.</p> <p>Includes:</p> <ul style="list-style-type: none"> • SEN reviews • Individual Education Plans (IEPs) / pupil profiles • Health questionnaires • Parental consent forms • Health care plans • Records of medicine administered • Work experience agreements
<p>Pupil's educational record (pupil file)</p> <p>All other pupils</p> <ul style="list-style-type: none"> • Primary 	Yes	The Education (Pupil Information) (England) Regulations 2005	<p>Retain while the pupil remains at the primary school, then:</p> <p>a) Pupil transfers to a known Local Authority primary or secondary school in Hampshire</p>	<p>The file should follow the pupil when he/she leaves primary school:</p> <p>a) Send pupil record to new school²</p>	<p>Includes:</p> <ul style="list-style-type: none"> • Health questionnaires • Parental consent forms • Health care plans • Records of medicine administered

² In the case of exclusion it may be appropriate to transfer the record to the Education and Inclusion Service

			<p>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/ Portsmouth</p> <p>c) Pupil transfers to a known primary / secondary school outside of the UK</p> <p>d) Pupil transfers to an unknown school</p>	<p>b) Send pupil record to new school, retaining a copy or summary until pupil is 22 years old, then destroy confidentially or delete securely</p> <p>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</p> <p>d) Retain pupil file until pupil is 22 years old, then destroy confidentially or delete securely</p>	
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5.14	<p>Pupil's educational record (pupil file)</p> <p>All other pupils</p> <ul style="list-style-type: none"> • Secondary 	Yes	Limitation Act (1980)	Date of birth of pupil + 22 years*	<p>Destroy</p> <p>Destroy as confidential waste or delete securely from electronic systems</p>	<p>*Unless child protection applies, in which case retain for 25 years from DOB; see 5.10.</p> <p>Includes:</p> <ul style="list-style-type: none"> • Health questionnaires • Parental consent forms • Health care plans • Records of medicine administered • Work experience agreements
5.15	<p>Pupil's educational record (pupil file)</p> <ul style="list-style-type: none"> • Deceased pupils 	Yes		Date of death + 7 years	<p>Destroy</p> <p>Destroy as confidential waste or delete securely from electronic systems</p>	

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	
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	
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 statistical information created by the school	Yes		Current academic year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
5.25	GCSE Assignments/ coursework/projects/ assessment videos	Yes		End of the academic year following the year in which the work was submitted	Destroy Destroy as confidential waste or delete securely from electronic systems	E.g. Exam May 19, destroyed Aug 20.
5.26	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: <ul style="list-style-type: none"> • 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) <ul style="list-style-type: none"> unsuccessful candidates 	Yes	PCC corporate guidelines	Date of interview + 1 year	Destroy Destroy as confidential waste or delete securely from electronic systems	Includes: <ul style="list-style-type: none"> proof of identity proof of right to work in the UK
7.2	Interview notes and recruitment records (including pre-employment vetting information) <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> 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	(Name of school) School does not retain copies of DBS certificates.
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	
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	
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 <ul style="list-style-type: none"> 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
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	
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	
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	
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	
8.13	Health and safety inspection records, including: <ul style="list-style-type: none"> • 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	archive	
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	
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	
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	<i>Formerly known as MI forms</i>

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	
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; when no longer required	
10.2	Plans of all properties belonging to the school	No		Permanent	Permanent Retain in school whilst operational; 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	
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					
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	
11.6	Annual Community Service plans			While current + 6 years	archive	
11.7	Income records for centre-run 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	archive	
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	archive	
12.2	Scrapbooks			While useful	archive	
12.3	Photo albums			While useful	archive	
12.4	School histories			While useful	archive	

12.5	Audio and video recordings			While useful	archive	
13.0	Biometrics					
13.1	Biometric templates				Only while in active use; delete immediately when pupil leaves/consent withdrawn (within 1 month maximum)	
13.2	Raw images/scans used for enrolment				Delete immediately after template creation	
13.3	Consent records			Duration of use + 1 year		
13.4	Biometric system audit logs			Up to 90 days		
13.5	Admin/system configuration logs			Up to 1 year		