



### **Data Retention policy (UK GDPR compliant)**

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| <b>Reviewed:</b>                      | May 2026                |
| <b>Review date:</b>                   | May 2027                |
| <b>Person responsible for policy:</b> | Data Protection Officer |
| <b>Publication:</b>                   | Website                 |

## **Data Retention policy (UK GDPR compliant)**

### **1. Aim and scope of policy**

This policy applies to the personal data of students, parents, carers, guardians, job applicants, existing and former employees, apprentices, volunteers, placement students, workers and self-employed contractors. It applies to personal data in manual and electronic form. The policy ensures compliance with the UK GDPR, Data Protection Act 2018, and relevant education legislation.

The policy stipulates the length and time a record needs to be retained, the basis on which the information is retained and the action which should be taken when it is no longer required

Where third parties process data on behalf of the School, the School will ensure that the third party takes such measures to retain securely such data and return or destroy data that no longer required in line with this policy. A written Data Processing Agreement is required and providers must meet minimum security standards. Data must be returned or securely destroyed at the end of the contract.

### **2. Principles of Data Retention**

The School retains personal data only for as long as necessary for the purposes for which it was collected, in line with:

- **Data minimisation**
- **Storage limitation**
- **Legal obligations**
- **Safeguarding requirements**
- **Public task duties**

Retention periods are defined in the Retention Schedule in Appendix 1.

### **3. Legal Bases for Retention**

Personal data is retained under the following lawful bases:

- **Legal obligation** – e.g., safeguarding, employment law, financial records
- **Public task** – education provision, statutory reporting
- **Vital interests** – safeguarding and child protection
- **Consent** – only for optional uses such as marketing images
- **Contract** – employment and payroll data

Special category data is retained under Article 9(2)(b), (g), or (i) as appropriate.

### **4. Types of data held**

The retention schedule in appendix 1 refers to all personal data, regardless of the media in which they are stored

Employees/workers/volunteers of the school are expected to manage their current personal data storage systems using the retention schedule (appendix 1). In addition, they are expected to

incorporate the different kinds of retention periods and storage considerations into account when creating new personal data recording systems.

## **5. Data security**

The School adopts procedures designed to maintain the security of personal data when it is stored. More information can be found in the Data Protection Policy on our website at [www.droitwichspahigh.worcs.sch.uk](http://www.droitwichspahigh.worcs.sch.uk)

Failure to follow the School's rules on data security may be dealt with via the School's disciplinary procedure. Appropriate sanctions include dismissal with or without notice dependent on the severity of the failure.

## **6. Secure Disposal**

At the end of the retention period, data will be securely destroyed using:

- Approved confidential waste contractors
- Permanent deletion of digital records
- Secure wiping of devices before disposal

A **disposal log** will be maintained, recording:

- Record type
- Date of destruction
- Method used
- Staff member/contractor responsible

## **7. Staff Responsibilities**

All staff must:

- Follow the retention schedule
- Store data securely
- Avoid unnecessary duplication
- Ensure personal data is moved out of email systems into the correct storage location
- Report any data breaches immediately

## **8. Training and Compliance Monitoring**

The School will:

- Provide regular GDPR and data handling training
- Conduct periodic audits of data retention and disposal
- Review this policy annually

## **9. Data Protection Officer**

The School's appointed Data Protection Officer is Head of Governance and Compliance in respect of its data protection activities who can be contacted at Droitwich Spa High School and Sixth Form Centre, Briar Mill, Droitwich, WR9 0AA or by email at [privacy@droitwichspahigh.worcs.sch.uk](mailto:privacy@droitwichspahigh.worcs.sch.uk) .

## **10. The School Website Privacy Page**

**The schools policies, privacy notices and forms are available on our web site at**

**<https://website.droitwichspa-high.worcs.sch.uk/index.php/communications/information-management-and-data-protection/>**



## **DROITWICH SPA HIGH SCHOOL AND SIXTH FORM CENTRE**

### **APPENDIX 1**

#### **DROITWICH SPA HIGH SCHOOL AND SIXTH FORM CENTRE RETENTION SCHEDULE TO BE USED IN CONJUNCTION WITH SCHOOL DATA PROTECTION AND DATA RETENTION POLICIES**

| Type of Document/File                                                                                                                                            | Retention Period                                   | Justification for Retention                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Action Taken at end of Retention Period                                                                                                                                                 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ADMISSIONS</b>                                                                                                                                                |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                         |
| Register of Admissions                                                                                                                                           | Twenty five years after the students date of birth | <p>Statutory Provisions include the School Admissions Code and Departmental advice for maintained schools, academies, independent schools and local authorities October 2014.</p> <p>We often receive enquiries from past pupils to confirm the dates they attended school.</p> <p>Admissions data is used extensively from the period of the school receiving it up until the point where children enrol. It is then used for some validation and cross checking of enrolment details. Once enrolled, the child's records in the Management Information System become the core record.</p> | <p>Information held will be reviewed and may be retained for twenty five years after the students date of birth otherwise it will be disposed of using an appropriate secure method</p> |
| Supplementary information submitted with application/appeal documentation, including religious and medical information etc. (where the admission was successful) | Twenty five years after the students date of birth |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Appropriate secure disposal methods                                                                                                                                                     |



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| Supplementary information submitted with application/appeal documentation, including religious and medical information etc. (where the admission was NOT successful) | Until the appeals process has been completed | Data about children who enrolled but didn't get in is useful, but any intelligence gathered from it (for example, the SEN make up) is aggregated within the first year to a level that is non-personal, after that, the detailed data within the admission file will be deleted. | Appropriate secure disposal methods |
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|  |  | <p>It is important to retain detailed data for a year, any appeals for which richer data about other successful/unsuccessful appeals may be relevant typically happen in the first year.</p> <p><b>Information about admissions appeals</b></p> <p>When dealing with appeals, having a reasonable history of any other appeals in some detail can be needed to deal with the particular appeal. The information is needed alongside the admissions policies of the time.</p> |  |
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#### STUDENT/EDUCATIONAL RECORDS

|                                                                        |                                                           |                                                                                   |                                     |
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| Public Examination results (Schools Copy)                              | Current year plus 6 years                                 | Uncollected certificates will be returned to the examination board                | Appropriate secure disposal methods |
| Internal examination results                                           | Twenty five years after the students date of birth        |                                                                                   | Appropriate secure disposal methods |
| Students' marked examination scripts                                   | Until the appeals / validation process has been completed | To meet the requirements of examination board validation and or appeals processes | Appropriate secure disposal methods |
| Photographs and videos used for examination/course assessment purposes | Until the appeals / validation process has been completed | To meet the requirements of examination board validation and or appeals processes |                                     |



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| Student-level value-added / contextual data                                                   | Current academic year, plus six years              |                                                                                                                                                                                                                                                                                                                                                                                                                          | Appropriate secure disposal methods |
| Safeguarding and Child Protection Information (held in a separate file from the student file) | Twenty five years after the students date of birth | <p>Statutory Instruments include Keeping children safe in education guidance and Working together to safeguard children.</p> <p>All data on safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name and address) that are needed to identify children with certainty are needed to be retained along with those records</p> | Appropriate secure disposal methods |
| Attendance data                                                                               | One year after leaving date of student             | Attendance is related to individual attainment and so being able to relate attendance to attainment whilst in our care is important. Keeping it in detailed, individual form for one year                                                                                                                                                                                                                                | Appropriate secure disposal methods |
|                                                                                               |                                                    | <p>after the pupil leaves school support conversations about detailed attendance that may be needed to best support that child.</p> <p>After that period, non-identifiable summary statistics are all that is required to support longer term trend analysis of attendance patterns.</p>                                                                                                                                 |                                     |
| Correspondence relating to authorised absence                                                 | Current academic year plus 2 years                 | Education Act 1996 Section 7                                                                                                                                                                                                                                                                                                                                                                                             | Appropriate secure disposal methods |

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| Behaviour related information                         | One year after leaving date of student                                                 | This is relevant for managing children when in school. 1 year allows a period of 'handover' if a child moves to another institution with conversations supported by rich data if relevant. However, if an allegation made by or against a student has been found to be unfounded or is not upheld following investigation, only the investigation summary of findings and conclusions will be retained, any copies of student interviews records made during the investigation will be removed from the student file immediately (or in the event of an appeal on the conclusion of the appeal if the investigation outcome is upheld). | Appropriate secure disposal methods |
| Permanent Exclusions                                  | Retained as part of student record -Twenty five years after the students date of birth | The data may be relevant to safeguarding, it could be needed for legal defence or complaints. It forms part of the student's formal history. Exclusion data will also be 'passed on' to subsequent settings.                                                                                                                                                                                                                                                                                                                                                                                                                            | Appropriate secure disposal methods |
| <b>EXTRA CURRICULAR ACTIVITIES</b>                    |                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                     |
| School Trip field file where no major incident occurs | Until the conclusion of the trip                                                       | Financial information related to trips should be retained for 6 years + 1 for audit purposes. This would include enough child identifiers to be able to confirm contributions.<br><br>A 'field file' is the information that is taken on a trip by a school. This can be destroyed following the trip, once any medicines administered on the trip have been entered onto the core system. If there is a minor medical incident on the trip (for example, a medical incident dealt with by staff in the                                                                                                                                 | Appropriate secure disposal methods |
| School Trips field file where a major incident occurs | Twenty five years after the students date of birth                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Appropriate secure disposal methods |
| Financial records relating to school trip payment     | six years plus one year from the date of the trip                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Appropriate secure disposal methods |



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|                                                           |                                                                                                                                                                                   | <p>way it would be dealt with 'within school'), then adding it into the core system would be done.</p> <p>If there is a major incident (for example, a medical incident that needed outside agency) then retaining the entire file until time that the youngest child becomes 25 would be appropriate.</p> <p>Permission to go on the trip slips will contain personal data, and destroying them after the trip unless any significant incident arises is appropriate, otherwise refer to the policies above.</p> <p>Schools sometimes share personal data with people providing 'educational visits' into school. Policies are in place to ensure that the sharing is proportionate and appropriately deleted afterwards.</p> |                                     |
| <b>SEND Data</b>                                          |                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                     |
| SEND files, reviews and Individual Education Plans (IEPs) | Twenty five years after the students date of birth (NB this is the minimum retention period but will be reviewed at this time to enable defence in the event of any legal action) | Statutory Provisions include: Limitation Act 1980, Education Act 1996, Special Needs and Disability Act 2001 section 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Appropriate secure disposal methods |



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| Statement of SEN, maintained under Section 324 of the Education Act 1996 / EHC plan, maintained under Section 37 of the Children and Families Act 2014 (and any amendments to the statement or plan) | Twenty-five years after the student's date of birth |                                                                                                                                                                                                                                     | Appropriate secure disposal methods |
| Information and advice provided to parents regarding SEND                                                                                                                                            | Twenty-five years after the student's date of birth |                                                                                                                                                                                                                                     | Appropriate secure disposal methods |
| <b>PERSONAL IDENTIFIERS</b>                                                                                                                                                                          |                                                     |                                                                                                                                                                                                                                     |                                     |
| School Photographs for identification/safeguarding purposes                                                                                                                                          |                                                     | Images are used for different reasons, and the reason should dictate the retention period. Images used purely for identification can be deleted when the child leaves the setting. Images used in displays etc. can be retained for | Appropriate secure disposal methods |



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|                                                                                         |                                                        | <p>educational purposes whilst the child is at the school. Other usages of images (for example, marketing) should be retained for and used in line with the active informed consent, captured at the outset of using the photograph.</p> <p>As set out in other sections, names are needed for smooth handover to subsequent schools for up to one year.</p> <p>Schools may well provide references for pupils for up to 3 years after they leave, and so retaining the name in the core pupil record is important (this doesn't mean it needs to be retained in all systems). Keeping names attached to safeguarding files for longer than this may be entirely appropriate – see safeguarding section.</p> <p>Characteristics form an essential part of trend analysis, and so retention is in line with those needs.</p> |                                     |
| Biometric data used for catering identification                                         | When taken off roll or when consent has been withdrawn | Biometric data (thumbprints used in catering) should be used and retained as set out in the active informed consent gained at the outset, but typically this should not be retained long after the activity that requested its use has finished (for example, the child no longer attends the school to have a meal).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Appropriate secure disposal methods |
| Photographs/video/social media used for other purposes will be by informed consent only | As outlined in consent                                 | Informed consent will be sought to use such items to 'celebrate' success in school and participation in significant events such as competitions, in addition in school publications such as the school prospectus and newsletters.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Appropriate secure disposal methods |



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| Medical information                                                                          | DOB of the child + 25 years         | To support any handover work about effective management of medical conditions to a subsequent institution.<br><br>Permission forms that parents sign should to be retained for the period that medication is given, and for 1 month afterwards if no issue is raised by child/parent. If no issue is | Appropriate secure disposal methods |
|                                                                                              |                                     | raised in that time that feels a reasonable window to assume all was administered satisfactorily.<br><br>Medical 'incidents' that have a behavioural or safeguarding angle (including the school's duty of care) should refer to the retention periods associated with those policies.               |                                     |
| <b>PARENT TEACHER ASSOCIATION</b>                                                            |                                     |                                                                                                                                                                                                                                                                                                      |                                     |
| Records relating to the creation and management of PTA that may contain personal identifiers | Current year plus 6 and then review |                                                                                                                                                                                                                                                                                                      | Appropriate secure disposal methods |
| <b>CURRICULUM MANAGEMENT</b>                                                                 |                                     |                                                                                                                                                                                                                                                                                                      |                                     |
| Schemes of work                                                                              | Current year plus 1 year            |                                                                                                                                                                                                                                                                                                      | Appropriate secure disposal methods |
| Timetable                                                                                    | Current year plus 1 year            |                                                                                                                                                                                                                                                                                                      | Appropriate secure disposal methods |
| Class Record Books                                                                           | Current year plus 1 year            |                                                                                                                                                                                                                                                                                                      | Appropriate secure disposal methods |
| Mark Books                                                                                   | Current year plus 1 year            |                                                                                                                                                                                                                                                                                                      | Appropriate secure disposal methods |
| Record of Homework set                                                                       | Current year plus 1 year            |                                                                                                                                                                                                                                                                                                      | Appropriate secure disposal methods |

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| Pupils Work                                                                                    | Retained for the current academic year, plus one year (where not already returned to students).                  |                                                                                                                                                                                                                                                                                                                              | Appropriate secure disposal methods |
| <b>OPERATIONAL ADMINISTRATION</b>                                                              |                                                                                                                  |                                                                                                                                                                                                                                                                                                                              |                                     |
| Visitor Books and Signing in Sheets                                                            | Current year plus 6 and then review                                                                              |                                                                                                                                                                                                                                                                                                                              | Appropriate secure disposal methods |
| CCTV Footage                                                                                   | 2 months (on a rolling basis)                                                                                    | CCTV footage may be used during an investigation in the event of a security breach on the school site<br>It may also be used to inform an investigation of an alleged serious misdemeanour by a student or students It may also be used to ensure the safety of staff and or students.                                       | Appropriate secure disposal methods |
|                                                                                                |                                                                                                                  | It may also be used by the school in the event of litigation claims made against us.                                                                                                                                                                                                                                         |                                     |
| <b>HEALTH AND SAFETY</b>                                                                       |                                                                                                                  |                                                                                                                                                                                                                                                                                                                              |                                     |
| Records relating to accident/injury at work                                                    | Date of incident plus 12 years. In the event of a serious accident a period of further retention may be required | Statutory instruments that may apply include: Social Security (Claims and Payments) Regulations 1979, Regulation 25. Social Security Administration Act 1992 Section 8, Limitation Act 1980, Control of Substances Hazardous to Health Regulations 2002, Control of Asbestos at Work Regulations 2012, SI1012 Regulation 19. | Appropriate secure disposal methods |
| Accident Reporting:<br><ul style="list-style-type: none"><li>Adults</li><li>Children</li></ul> | Date of incident plus 6 years<br>DOB of child plus 25 years                                                      |                                                                                                                                                                                                                                                                                                                              | Appropriate secure disposal methods |



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| COSHH related information/reports that may contain persona identifiers     | Current year plus 40 years                                                                                                                  |                                                                                                                                                                                                                                                                             | Appropriate secure disposal methods |
| Asbestos related information/reports that may contain personal identifiers | Last Action plus 40 years                                                                                                                   |                                                                                                                                                                                                                                                                             | Appropriate secure disposal methods |
| <b>FINANCIAL INFORMATION</b>                                               |                                                                                                                                             |                                                                                                                                                                                                                                                                             |                                     |
| Student Grant applications                                                 | Current year plus 3 years                                                                                                                   |                                                                                                                                                                                                                                                                             | Appropriate secure disposal methods |
| Free School Meal registers                                                 | Current year plus 6 years                                                                                                                   |                                                                                                                                                                                                                                                                             | Appropriate secure disposal methods |
| Parent Pay Records                                                         | Current year plus 6 years                                                                                                                   |                                                                                                                                                                                                                                                                             | Appropriate secure disposal methods |
| <b>LA Related</b>                                                          |                                                                                                                                             |                                                                                                                                                                                                                                                                             |                                     |
| Secondary Transfer Sheets (Primary)                                        | Current year + 2 years                                                                                                                      |                                                                                                                                                                                                                                                                             |                                     |
| Attendance Returns                                                         | Current year + 1 year                                                                                                                       |                                                                                                                                                                                                                                                                             |                                     |
| <b>OUTSIDE AGENCIES</b>                                                    |                                                                                                                                             |                                                                                                                                                                                                                                                                             |                                     |
| Referral forms                                                             | While the referral is current                                                                                                               |                                                                                                                                                                                                                                                                             | Appropriate secure disposal methods |
| Contact Data Sheets/database entries                                       | Current year and then review and destroy if no longer needed                                                                                |                                                                                                                                                                                                                                                                             | Appropriate secure disposal methods |
| <b>HUMAN RESOURCES</b>                                                     |                                                                                                                                             |                                                                                                                                                                                                                                                                             |                                     |
| All records leading up to the appointment of a new Headteacher             | All the relevant information should be added to the Personal file and retained for duration of employment plus 6 years and 50 years for the | Statutory Instruments that may apply include: Keeping Children Safe in Education Guidance. DBS update Service Guide. (Statutory Guidance from Dept. of Education sections 73 and 74). Home Office Employers Guide to Right to Work Checks. Limitation Act 1980 (Section 2). | Appropriate secure disposal methods |



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|                                                                                              | pension service related information. With the exception of those records shown below                                                                                                                                                                                                                              | Immigration and Asylum and Nationality Act, Working Time Regulations 1998.                                                                                                                                                                                                                                                                             |                                     |
| All records leading up to the appointment of a new member of staff – unsuccessful candidates | Date of appointment of successful candidate + 6 months                                                                                                                                                                                                                                                            | Information is retained in line with ICO guidance for litigation defence in the event of action being taken against the school.                                                                                                                                                                                                                        | Appropriate secure disposal methods |
| All records leading up to the appointment of a new member of staff – successful candidate    | All the relevant information should be added to the staff Personal file and retained for duration of employment plus 6 years and 50 years for the pension service related information. With the exception of those records shown below                                                                            | Service information will need to be retained to meet the requirements of pension providers who may have queries in relation to service dates.<br><br>It is also the case that employment dates may need to be confirmed for reference and safeguarding purposes throughout the employment of the individual if they remain in an education environment | Appropriate secure disposal methods |
| Pre-employment vetting information – DBS Checks<br>No DBS Update Service<br>Employer         | The school does not keep copies of DBS certificates. The certificate number and issue date is retained on the schools single central record and within their personnel file<br><br>SCR data is deleted after date of leaving plus one year when it will be reviewed with a view to further retention if required. |                                                                                                                                                                                                                                                                                                                                                        | Appropriate secure disposal methods |



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| Pre-employment vetting information – Evidence proving the right to work in the United Kingdom <sup>4</sup>                 | Until termination of employment plus 6 years                                                                                                                                                                                                                                                           |  | Appropriate secure disposal methods |
| Staff Personal File (Paper)                                                                                                | Until termination of employment plus 6 years and 50 years for pension information                                                                                                                                                                                                                      |  | Appropriate secure disposal methods |
| Staff Personnel File (computerised)                                                                                        | Until termination of employment plus 6 years                                                                                                                                                                                                                                                           |  | Appropriate secure disposal methods |
| Annual appraisal/ assessment records                                                                                       | 6 years after leaving date                                                                                                                                                                                                                                                                             |  | Appropriate secure disposal methods |
| Allegation of a child protection nature against a member of staff including where the allegation is unfounded <sup>5</sup> | Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from Personnel files. If found they are to be kept on the file and a copy provided to the person concerned |  | Appropriate secure disposal methods |



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| Disciplinary/ Capability Proceedings                                                 | As set out in Disciplinary and Capability Procedures available in Staff handbook and from HR on request                       |                                                                                                                                                                                                                                                   | Appropriate secure disposal methods |
| PAYROLL                                                                              |                                                                                                                               |                                                                                                                                                                                                                                                   |                                     |
| Timesheets                                                                           | Current year plus 6 years                                                                                                     | Statutory instruments that may be applicable include:<br>Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960),revised 1999 (SI1999/567)<br>Retirement Benefits Schemes (Information Powers) Regulations 1995<br>Financial Regulations | Appropriate secure disposal methods |
| Maternity pay records                                                                | Current year + 3 years                                                                                                        |                                                                                                                                                                                                                                                   | Appropriate secure disposal methods |
| Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Current year plus 6 years                                                                                                     |                                                                                                                                                                                                                                                   | Appropriate secure disposal methods |
| School salary budget Reports                                                         | Current year plus 6 years                                                                                                     | In addition, to meet school audit and accounting requirements                                                                                                                                                                                     | Appropriate secure disposal methods |
| GOVERNANCE                                                                           |                                                                                                                               |                                                                                                                                                                                                                                                   |                                     |
| Agendas for Governor Meetings (where personal identifiers may be used)               | One master copy retained with master set of minutes                                                                           |                                                                                                                                                                                                                                                   | n/a                                 |
| Minutes of Governors meetings (where personal identifiers may be used)               | permanently and all other copies destroyed                                                                                    |                                                                                                                                                                                                                                                   | n/a                                 |
| Reports presented to Governing Bodies (where they contain personal identifiers)      | Minimum of 6 years however if minutes refer directly to report then this should also be retained permanently with the minutes |                                                                                                                                                                                                                                                   | Appropriate secure disposal methods |

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| Records of complaints dealt with by Governing Body                             | Date of resolution of the complaint and a minimum of 6 years thereafter then a review for further retention in the case of contentious disputes |  | Appropriate secure disposal methods |
| <b>HEADTEACHER/SLT RELATED</b>                                                 |                                                                                                                                                 |  |                                     |
| Minutes of meetings if they contain personal identifiers                       | Date of meeting plus 3 years then review for further retention period if required                                                               |  | Appropriate secure disposal methods |
| Reports created by Head or SLT if they contain personal identifiers            | Date of report plus 3 years then review for further retention period if required                                                                |  | Appropriate secure disposal methods |
| Sundry correspondence created by Head/SLT if they contain personal identifiers | Date of correspondence plus 3 years then review for further retention period if required                                                        |  | Appropriate secure disposal methods |
| Professional Development Plans                                                 | Life of plan plus 6 years                                                                                                                       |  | Appropriate secure disposal methods |

**This Document is to read in conjunction with the following notes:**

1. The D of E Schools Toolkit and IRMS Toolkit were used in the development of this retention schedule which conforms to the requirements of the Data Protection Act 2018 and the GDPR Regulations 2018
2. This retention schedule only relates to information that would have data protection issues (ie would contain personal identifiers)
3. For operational reasons disposal of data will take place in the School's summer closure period of the academic year the data becomes due for disposal.
4. All personal data is stored in an appropriate and secure locations until destruction:

- paper based data is stored in locked cabinets and offices and classrooms remain locked when the school is closed
- computer based information is retained on secure servers (NB general email correspondence that does not fall into the retention categories outlined above are automatically deleted from the secure servers 30 days from the issue/received date) 5. The date of birth used will be that as shown on the student or staff record

6. Secure disposal methods used by the school include:

- ☐ Destruction of paper documents using an approved contractor who specialised in the secure disposal of paper based data
- ☐ Permanent deletion of computer based records

### **Data Protection Officer**

The School's Data Protection Officer is the *Head of Governance and Compliance* who can be contacted at Droitwich Spa High School and Sixth Form Centre, Briar Mill, Droitwich, WR9 0AA or by email at [privacy@droitwichspahigh.worcs.sch.uk](mailto:privacy@droitwichspahigh.worcs.sch.uk).

### **Chief Privacy Officer**

*The HR and Administration Manager* is the School's appointed chief privacy officer in respect of its data protection activities who can be contacted at Droitwich

Spa High School and Sixth Form Centre, Briar Mill, Droitwich, WR9 0AA or by email at [privacy@droitwichspahigh.worcs.sch.uk](mailto:privacy@droitwichspahigh.worcs.sch.uk)

[The schools policies, privacy notices and forms are available on our web site at www.droitwichspahigh.worcs.sch.uk](http://www.droitwichspahigh.worcs.sch.uk)



