Ormiston Academies Trust

Records retention policy

Policy version control

Policy type	Mandatory
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Review	Policies will be reviewed in line with OAT's internal policy schedule and/or updated when new legislation comes into force
Description of changes	 Table of retention periods moved to appendix 1 Records retention audit proforma moved to appendix 2 Attendance register retention period amended from 3 years to 6 to reflect new statutory guidance

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1. Introduction

- 1.1. The main aim of this policy is to enable Ormiston Academies Trust to manage hard and electronic records effectively and in compliance with the UK General Data Protection Regulations (UK GDPR). As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.
- 1.2. Ormiston Academies Trust is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.
- 1.3. The table in appendix 1 sets out the main categories of information that we hold, the length of time that we intend to hold them, and the reason for this.
- 1.4. For information, the tables below set out the legal and other requirements for certain categories of document.
- 1.5. Sections 2 -7 of this policy sets out the destruction procedures for documents at the end of their retention period. The Data Protection Officer (DPO) team (dpo@ormistonacademies.co.uk) and academy Data Protection Lead (DPL) shall be responsible for ensuring that this is carried out appropriately, and any questions regarding this policy should be referred to them.
- 1.6. If a document or piece of information is reaching the end of its stated retention period, but you are of the view that it should be kept longer, please refer to The Data Protection Officer (DPO) via the Data Protection Lead (DPL) who will make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.

2. Deletion and retention of documents

- 2.1. When a document is at the end of its retention period, it should be dealt with in accordance with this policy.
- 2.2. All personal data which is deleted in line with retention periods should be recorded on a log. This can be done as batch entries where appropriate.
- 2.3. Confidential waste (Secure Disposal) should be made available for collection in the confidential waste bins or sacks or shredded through OAT assessed compliant data disposal organisations.
- 2.4. Anything that contains personal information should be treated as confidential.

3. Other documentation

3.1. Other documentation can be deleted or placed in recycling bins where appropriate.

4. Automatic deletion

4.1. Certain information will be automatically archived by the computer systems. Should you want to retrieve any information, or prevent this happening in a particular circumstance, please contact the ICT lead in your academy or The Web Services Manager for Head Office.

5. Individual responsibility

- 5.1. Where information for disposal is held by individual members of staff, this should be made available for collection in the confidential waste bins or sacks or shredded through OAT assessed compliant data disposal organisations. Prior to disposal consideration should be given to the following questions:
- Has the information come to the end of its useful life?
- Is there a legal requirement to keep this information or document for a set period?
- Would the information be likely to be needed in the case of any legal proceedings? In particular, is it
 potentially relevant to an historic child abuse enquiry? (Is the information contentious, does it relate
 to an incident that could potentially give rise to proceedings?)
- Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?
- Is the document of historic or statistical significance?
- 5.2. If the decision is made to keep the document, this must be referred to the Data Protection Officer via the Data Protection Lead of an individual academy and reasons given.

6. Deletion and retention of data stored as email

- 6.1. Email services have an operational function and are not provided for the storage or filing of documents and as such emails must be reviewed and dealt with promptly.
- 6.2. Information that is attached to or contained within emails is subject to a retention period as detailed within section 2 of this document.

7. Deletion and retention of user accounts, including email and other third-party services

- 7.1. Network accounts will be locked as soon as the user leaves the employment of the trust or its academies. A decision on the retention of data should be decided within 90 days. The files and emails should be moved to the required appropriate storage during this time.
- 7.2. A list of the users third party access should already be known for each user or should be able to be ascertained quickly. All third-party access should be removed immediately upon the user leaving the trust.

8. Retention audit guidance

- 8.1. It is the responsibility of the Data Protection Lead (DPL) and local IT to ensure retention audits are conducted at regular intervals. This can be done on a termly basis, half termly or any other interval the academy deems appropriate.
- 8.2. The Retention Audit findings need to be documented and sent to OAT Data Protection Officer: dpo@ormistonacademies.co.uk.
- 8.3. It is recommended that all staff at your academy have reviewed the record retention policy and technology acceptable use policy staff and stakeholders, so that any questions about these policies can be raised and addressed before conducting a retention audit.
- 8.4. The retention audit should be conducted on a random sample of staff and data types, if possible, avoid staff doing the same job role. For example, if you conducted your audit on 10 members of staff, and they were all teaching staff, this would not include a variety of job roles. Data types can be picked from the sections of the Record Retention Policy E.g. Health and Safety Documents.
- 8.5. Questionnaire at appendix 2 should be completed by the staff member included in the audit and where possible, the information provided verified by the DPL and/local IT member. For example, if the staff member states they delete emails within the required retention period, then a check of the staff email account should show this is the case.

Appendix 1 Retention periods

Academies are governed by the Academy Trust, which will usually be a company limited by guarantee¹. The Academy Trust may also be a charitable trust.

Governance	Governance of the Academy Trust							
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record			
1.1.1	Governance Statement	No		Life of governance statement + 6 years	SECURE DISPOSAL			
1.1.2	Articles of Association	No		Life of the Academy				
1.1.3	Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL			
1.1.4	Memorandum of Understanding of Shared Governance among Schools	No	Companies Act 2006 section 355	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL			
1.1.5	Constitution	No		Life of the Academy				
1.1.6	Special Resolutions to amend the Constitution	No		Life of the Academy				
1.1.7	Written Scheme of Delegation	No	Companies Act 2006 section 355	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL			
1.1.8	Directors – Appointment	No		Life of appointment + 6 years	SECURE DISPOSAL			

¹ A **company limited by guarantee** does not usually have a share capital or shareholders, but instead has members who act as guarantors. The guarantors give an undertaking to contribute a nominal amount (typically very small) in the event of winding up of the **company**. In the case of an Academy, the guarantors will guarantee the sum of £10 each.

Governance of the Academy Trust Basic file description Statutory Provisions Retention Period Action at end of **Data Protection** [Operational] administrative Issues life of the record Date of disqualification + 15 1.1.9 Directors - Disqualification No **Company Directors** SECURE Disqualification Act years DISPOSAL 1986 Date of termination + 6 1.1.10 Directors – Termination of SECURE No Office DISPOSAL vears 1.1.11 Annual Report – Trustees No Companies Act 2006 Date of report + 10 years SECURE section 355 DISPOSAL Report 1.1.12 **Annual Report and Accounts** No Companies Act 2006 Date of report + 10 years SECURE section 355 DISPOSAL 1.1.13 Annual Return Companies Act 2006 Date of report + 10 years SECURE No

1.1.14

1.1.15

1.1.16

1.1.17

1.1.18

Appointment of Trustees and

Appointment and removal of

Strategic Plan [also known as

School Development Plans]

Governors and Directors

Statement of Trustees

Responsibilities

Strategic Review

Members

Yes

No

No

No

No

section 355

DISPOSAL

DISPOSAL

DISPOSAL

DISPOSAL

DISPOSAL

DISPOSAL

SECURE

SECURE

SECURE

SECURE

SECURE

Life of appointment + 6

Life of appointment + 6

Life of appointment + 6

Life of plan + 6 years

Date of the review + 6 years

vears

vears

years

Gov	Governance of the Academy Trust							
		Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record		
	1.1.19	Accessibility Plan	There may be if the plan refers to specific pupils	Limitation Act 1980 (Section 2)	Life of plan + 6 years	SECURE DISPOSAL		

	Basic file description Data Protection Statutory Issues Provisions		_	Retention Period [Operational]	Action at end of administrative life of the record	
	Board of Directors					
1.2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES	
1.2.2	Board Decisions	Could be if the decisions refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES	
1.2.3	Board Meeting: Annual Schedule of Business	No		Current year	SECURE DISPOSAL	
1.2.4	Board Meeting: Procedures for conduct of meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	SECURE DISPOSAL	
	Committees ²					
1.2.5	Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES	
	General Members' Meeting					
1.2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting ³	OFFER TO ARCHIVES	

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² The board can establish any committee and determine the constitution, membership and proceedings that will apply.

³ The signed minutes must be kept securely together with the notice and agenda for the meeting and supporting documentation provided for consideration at the meeting. Documentation is generally filed in a dedicated minute book, which is usually in the form of a loose-leaf binder to which additional pages can be easily added.

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.7	Records relating to the management of the Annual General Meeting ⁴	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting ⁵	OFFER TO ARCHIVES
	Governors				
1.2.8	Agendas for Governing Body meetings	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL
1.2.9	Minutes of, and papers considered at, meetings of the Governing Body and its committees	May be data protection issues, if the meeting is dealing with confidential issues relating to staff			
	Principal Set (signed)			Life of Academy	
	Inspection Copies ⁷			Date of meeting + 3 years	SECURE DISPOSAL

⁴ Not all Academies are required to hold an Annual General Meeting for the Members – the requirement will be stated in the Constitution.

⁵ The signed minutes must be kept securely together with the notice and agenda for the meeting and any supporting documentation provided for consideration at the meeting. Documentation is generally filed in a dedicated minute book, which is usually in the form of a loose-leaf binder to which additional pages can be easily added.

⁶ In this context, SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross-cut shredder.

⁷ These are the copies which the clerk to the Governor may wish to retain, so that requestors can view all the relevant information, without the clerk needing to print off and collate

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.10	Reports presented to the Governing Body	May be data protection issues, if the report deals with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy	SECURE DISPOSAL or retain with the signed set of minutes
1.2.11	Meeting papers relating to the annual parents' meeting held under Section 33 of the Education Act 2002		Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
1.2.12	Trusts and Endowments managed by the Governing Body	No		PERMANENT	
1.2.13	Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL

redacted copies of the minutes each time a request is made.

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.14	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
	Statutory Registers ⁸				
1.2.15	Register of Directors		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.16	Register of Directors' interests [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.17	Register of Directors' residential addresses		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.18	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.19	Register of members		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.20	Register of secretaries		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL

⁸ Academies are required by law to keep specific records, collectively known as statutory registers or the statutory books. The registers record information relating to the Academy's operations and structure, such as the current directors. Records should be kept up-to-date to reflect any changes that take place.

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	
1.2.21	Register of Trustees interests			Life of the Academy + 6 years	SECURE DISPOSAL	
1.2.22 Declaration of Interests Statements [Governors] [this is not a statutory register]				Life of the Academy + 6 years	SECURE DISPOSAL	

Funding and Finance							
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record		
	Strategic Finance						
1.3.1	Statement of financial activities for the year	No		Current financial year + 6 years	SECURE DISPOSAL		
1.3.2	Financial planning	No		Current financial year + 6 years	SECURE DISPOSAL		
1.3.3	Value for money statement	No		Current financial year + 6 years	SECURE DISPOSAL		
1.3.4	Records relating to the management of VAT	No		Current financial year + 6 years	SECURE DISPOSAL		
1.3.5	Whole of government accounts returns	No		Current financial year + 6 years	SECURE DISPOSAL		

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.6	Borrowing powers	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.7	Budget plan	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.8	Charging and remissions policy	No		Date policy superseded + 3 years	SECURE DISPOSAL
	Audit Arrangements				
1.3.9	Audit Committee and appointment of responsible officers	No		Life of the Academy	SECURE DISPOSAL
1.3.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	SECURE DISPOSAL
1.3.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	SECURE DISPOSAL
	Funding Agreements				
1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements9	No		Date of last payment of funding + 6 years	SECURE DISPOSAL

⁹ Where there is multi-Academy governance.

Funding and F	Funding and Finance							
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record			
1.3.13	Funding Agreement – Termination of the funding agreement ¹⁰			Date of last payment of funding + 6 years	SECURE DISPOSAL			
1.3.14	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	SECURE DISPOSAL			
1.3.15	Funding Records – Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL			
1.3.16	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL			
1.3.17	Per pupil funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL			
1.3.18	Exclusions agreement ¹¹	No		Date of last payment of funding + 6 years	SECURE DISPOSAL			
1.3.19	Funding records ¹²	No		Date of last payment of funding + 6 years	SECURE DISPOSAL			
1.3.20	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	SECURE DISPOSAL			

¹⁰ Either party may give not less than 7 financial years' written notice to terminate the Agreement, such notice to expire on 31 August. Or, where the Academy has significant financial issues or is insolvent, the Agreement can be terminated by the Secretary of State to take effect on the date of the notice.

¹¹ The Academy can enter into an arrangement with a Local Authority (LA), so that payment will flow between the Academy and the LA, in the same way as it would do were the Academy a maintained school.

¹² Funding agreement which says that the Academy can receive donations and can only charge where the law allows maintained schools to charge [see Charging and Remission Policy].

	Basic file description	Data Protection	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of
1.3.21	Records relating to loans	No Issues		Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	SECURE DISPOSAL
	Payroll and Pensions				
1.3.22	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
1.3.23	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)	From the end of the year in which the accounts were signed for a minimum of 6 years	SECURE DISPOSAL
1.3.24	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.25	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.26	Payroll records	Yes		Date payroll run + 6 years	SECURE DISPOSAL

Funding and Finance Action at end of **Basic file description Retention Period Statutory Provisions** Data Protection [Operational] administrative life of the record Issues Insurance policies Date the policy expires + SECURE DISPOSAL 1.3.27 No 6 years Date claim settled + 6 1.3.28 Records relating to the SECURE DISPOSAL No settlement of insurance years claims 1.3.29 Employer's Liability Closure of the school + No SECURE DISPOSAL Insurance Certificate 40 years **Endowment Funds and Investments** SECURE DISPOSAL 1.3.30 Investment policies No Life of the investment + 6 years 1.3.31 Management of Life of the fund + 6 years No **Endowment Funds** Accounts and Statements 1.3.32 Annual accounts No Current year + 6 years STANDARD DISPOSAL 1.3.33 Loans and grants Date of last payment on No SECURE DISPOSAL the loan + 12 years then managed by the school

Student Grant

applications

Yes

1.3.34

REVIEW

Current year + 3 years

SECURE DISPOSAL

Funding and Finance Basic file description Statutory Provisions Retention Period Action at end of Data **Protection** [Operational] administrative life of the record Issues 1.3.35 All records relating to the Life of the budget + 3 SECURE DISPOSAL No creation and vears management of budgets, including the Annual Budget statement and background papers 1.3.36 Invoices, receipts, order Current financial year + 6 SECURE DISPOSAL No books and requisitions, years delivery notices 1.3.37 Records relating to the No Current financial year + 6 SECURE DISPOSAL collection and banking of years monies Records relating to the 1.3.38 No Current financial year + 6 SECURE DISPOSAL identification and years collection of debt **Contract Management** 1.3.39 All records relating to the Limitation Act 1980 Last payment on the SECURE DISPOSAL No management of contract + 12 years contracts under seal 1.3.40 All records relating to the Last payment on the SECURE DISPOSAL No Limitation Act 1980

contract + 6 years

Current year + 2 years

management of

contracts under

Records relating to the

monitoring of contracts

No

signature

1.3.41

SECURE DISPOSAL

Funding and Finance **Basic file description Statutory Provisions Retention Period** Action at end of Data Protection [Operational] administrative life of the record Issues **Asset Management** 1.3.42 Inventories of furniture Current year + 6 years SECURE DISPOSAL No and equipment 1.3.43 Burglary, theft and Current year + 6 years SECURE DISPOSAL No vandalism report forms 1.3.44 Records relating to the Current year + 6 years No SECURE DISPOSAL leasing of shared facilities, such as sports centres Land and building Date valuation SECURE DISPOSAL 1.3.45 No valuations superseded + 6 years 1.3.46 Disposal of assets No Date asset disposed of + SECURE DISPOSAL 6 years 1.3.47 Community School leases Date lease expires + 6 SECURE DISPOSAL No for land years 1.3.48 Commercial transfer SECURE DISPOSAL No Date of transfer + 6 years arrangements Life of land ownership SECURE DISPOSAL Transfer of land to the 1.3.49 No **Academy Trust** then transfer to new owner

Life of land ownership

then transfer to new

owner

1.3.50

Transfers of freehold

land

School Fund

No

SECURE DISPOSAL

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.51	School Fund – Cheque books	No		Current year + 6 years	SECURE DISPOSAL
1.3.52	School Fund – Paying in books	No		Current year + 6 years	SECURE DISPOSAL
1.3.53	School Fund – Ledger	No		Current year + 6 years	SECURE DISPOSAL
1.3.54	School Fund – Invoices	No		Current year + 6 years	SECURE DISPOSAL
1.3.55	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
1.3.56	School Fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL
1.3.57	School Fund – Journey books	No		Current year + 6 years	SECURE DISPOSAL
	School Meals ¹³				
1.3.58	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
1.3.59	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.60	School meals summary sheets	No		Current year + 3 years	SECURE DISPOSAL

As a charity, an Academy is not permitted to trade and make a profit. It is, however, possible to set up a subsidiary trading company, which can sell products or services and Gift Aid profits back to the Academy. If the Academy operates a subsidiary company, it is expected that these records will be managed in line with standard business practice.

¹³ Unless it would be unreasonable to do so, school lunches should be provided when they are requested by, or on behalf of, any pupil. A school lunch must be provided free of charge to any pupil entitled to free school lunches. From September 2014, free school lunches must be provided to all KS1 pupils.

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.4.1	Data Protection Policy, including data protection notification	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.2	Freedom of Information Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.3	Information Security Breach Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.4	Special Educational Needs Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.5	Complaints Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.6	Risk and Control Framework	No		Life of framework + 6 years	SECURE DISPOSAL
1.4.7	Rules and Bylaws	No		Date rules or bylaws superseded + 6 years	SECURE DISPOSAL
1.4.9	Home School Agreements ¹⁴	No		Date agreement revised + 6 years	SECURE DISPOSAL
1.4.10	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	SECURE DISPOSAL

 $^{^{14}}$ This should be drawn up in consultation with parents and should apply to all pupils.

	Basic file	description	Data Protection Issues	Statu Provi	tory sions	Retention Period [Operational]	Action at end of administrative life the record
2.1 R	Recruitment ¹⁵						
	Basic file description	Data Protection Issues	Statutory Prov	risions	Retentio	n Period [Operational]	Action at end of administrative life of the record
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes			Date of a	appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes				appointment of successful e + 6 months	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes			to the St	ant information should be added aff Personal File (see below) and information retained for 6	SECURE DISPOSAL

¹⁵ Academies do not necessarily have to employ people with qualified teacher status; only the SEN and designated LAC teacher must be qualified.

	Basic file	description	Data Protection Issues	Statuto Provis		Retention Period [Operational]	Action at end of administrative life the record	0
2.1.4	Pre-employment vetting information – DBS Checks ¹⁶	No	DBS Update Ser Employer Guide 2014		DBS certifi by the indi	isation should take a copy of the cate when it is shown to them ividual and should be added to ersonal File	SECURE DISPOSAL	
2.1.5	Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure	Yes			and a note what has k necessary	ssible, these should be checked, kept of what was seen and been checked. If it is felt to keep copy documentation, hould be added to the Staff ile	SECURE DISPOSAL	
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ¹⁷	Yes	An employer's g right to work ch [Home Office M	ecks	be added they are kee	ssible, these documents should to the Staff Personal File, but if ept separately, then the Home uires that the documents are ermination of employment plus an 2 years	SECURE DISPOSAL	
2.1.7	Records relating to the employment of overseas teachers	Yes			be added they are kee	essible, these documents should to the Staff Personal File, but if ept separately, then the Home uires that the documents are ermination of employment plus an 2 years	SECURE DISPOSAL	

Academies are bound by the legislation that applies to independent schools NOT maintained schools.
 Employers are required to take a "clear copy" of the documents which they are shown as part of this process.

Polici	Policies, Frameworks and Overarching Requirements								
		Basic file	description	Data Protection Issues	Statuto Provis		etention Period Operational]	Action at end of administrative life the record	of
2.1.8	Records rel	_	Yes				nber of staff transfers or anisation + 6 years	SECURE DISPOSAL	

Oper	Operational Staff Management						
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record		
2.2.1	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980 (Section 2)	Termination of employment + 6 years	SECURE DISPOSAL		
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL		
2.2.3	Annual appraisal/assessment records	Yes		Current year + 5 years	SECURE DISPOSAL		
2.2.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	SECURE DISPOSAL		
2.2.5	Training needs analysis	No		Current year + 1 year	SECURE DISPOSAL		

Mana	gement of Disciplinary and Gri	evance Proces	ses		
	Basic file description	Data Protection Issues			
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded	Yes	"Keeping children safe in education Statutory guidance for schools and colleges September 2023"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children December 2023"	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			
	Oral warning			Date of warning ¹⁸ + 6 months	SECURE DISPOSAL ¹⁹
	Written warning – level 1			Date of warning + 6 months	SECURE DISPOSAL ²⁰
	Written warning – level 2			Date of warning + 12 months	SECURE DISPOSAL ²¹
	Final warning			Date of warning + 18 months	SECURE DISPOSAL ²²

¹⁸ Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice.

¹⁹ If warnings are placed on personal files, then they must be weeded from the file.

²⁰ If warnings are placed on personal files, then they must be weeded from the file.

²¹ If warnings are placed on personal files, then they must be weeded from the file.

²² If warnings are placed on personal files, then they must be weeded from the file.

Mana	anagement of Disciplinary and Grievance Processes							
	Basic file description	Data Protection Issues						
	Case not found		If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL				

Health	Health and Safety							
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record			
2.4.1	Health and Safety policy statements	No		Life of policy + 3 years	SECURE DISPOSAL			
2.4.2	Health and Safety risk assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL			
2.4.3	Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	SECURE DISPOSAL			

Health	and Safety				
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.4.4	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below	
	• Adults			Date of incident + 6 years	SECURE DISPOSAL
	Children			Date of birth of the child + 25 years	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No		Current year + 10 years then REVIEW	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No		Last action + 40 years	SECURE DISPOSAL
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire precautions log books	No		Current year + 6 years	SECURE DISPOSAL

Health	Health and Safety						
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record		
2.4.9	Fire risk assessments	No	Fire Service Order 2005	Life of the risk assessment + 6 years	SECURE DISPOSAL		
2.4.10	Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL		

Admi	Admissions						
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record		
3.1.1	All records relating to the creation and implementation of the School Admissions' Policy	No	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then REVIEW	SECURE DISPOSAL		

Admis	ssions				
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
3.1.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL
3.1.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
3.1.4	Register of admissions	Yes	Working together to improve school attendance August 2024	Every entry in the admission register must be preserved for a period of 6 years after the date on which the entry was made ²³	REVIEW Schools may wish to consider keeping the admission register permanently, as often schools receive enquiries from past pupils to confirm the dates they attended the school

²³ Working together to improve school attendance: statutory guidance for maintained school, academies, independent schools and local authorities p17

Admissions Basic file description Statutory Provisions Retention Period Action at end of administrative Data Protection [Operational] life of the record Issues 3.1.5 Admissions – Secondary Current year + 1 year SECURE DISPOSAL Yes Schools – Casual 3.1.6 Proofs of address supplied by School Admissions Code Yes Current year + 1 year SECURE DISPOSAL parents as part of the Statutory Guidance for admissions process admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014 3.1.7 Supplementary information Yes form, including additional information such as religion and medical conditions This information should be For successful SECURE DISPOSAL added to the pupil file admissions Until appeals process • For unsuccessful SECURE DISPOSAL completed admissions

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
3.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then REVIEW	These could be of permanent historical value and should be offered to the County Archives Service, if appropriate
3.2.2	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL
3.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then REVIEW	SECURE DISPOSAL
3.2.4	Records created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then REVIEW	SECURE DISPOSAL
3.2.5	Correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL
3.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL

Opera	Operational Administration						
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record		
3.3.1	Management of complaints	Yes		Date complaint resolved + 3 years	SECURE DISPOSAL		
3.3.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	SECURE DISPOSAL		
3.3.3	Records relating to the management of software licences	No		Date licence expires + 6 years	SECURE DISPOSAL		
3.3.4	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL		
3.3.5	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL		
3.3.6	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL		
3.3.7	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL		
3.3.8	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL		
3.3.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL		

This section covers the management of buildings and property.

Prope	Property Management						
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record		
4.1.1	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry			
4.1.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold			
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL		
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL		
4.1.5	Business continuity and disaster recovery plans	No		Date the plan superseded + 3 years	SECURE DISPOSAL		

Maint	Maintenance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL	
4.2.2	All records relating to the maintenance of the school carried out by school employees, including maintenance log books	No		Current year + 6 years	SECURE DISPOSAL	

Fleet	Fleet Management						
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record		
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL		
4.3.2	The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, maintenance	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL		
4.3.3	Service logs and vehicle logs	N	Limitation Act 1980 (Section 2)	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	SECURE DISPOSAL		

Fleet Management						
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	
4.3.4	GPS tracking data relating to the vehicles	N	Limitation Act 1980 (Section 2)	Date of journey + 6 years	SECURE DISPOSAL	

This section includes all records which are created during the time a pupil spends at the school. For information about accident reporting, see under Health and Safety above.

Pupil	Pupil's Educational Record								
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record				
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437						
	Primary			Retain whilst the child remains at the primary school	The file should follow the pupil when they leave the primary school. This will include:				

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
				 To another primary school To a secondary school To a pupil referral unit If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the LA, as it is more likely that the pupil will request the record from the LA

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	Secondary		Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	SECURE DISPOSAL
5.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	SECURE DISPOSAL
5.1.3	Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be retained	
5.1.4	Examination results – pupil copies	Yes			
	• Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	• Internal			This information should be added to the pupil file	

Pupil'	Pupil's Educational Record								
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record				
5.1.5	Child protection information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges September 2023"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children December 2023"	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file	SECURE DISPOSAL – these records MUST be shredded				
5.1.6	Child protection information held in separate files	Yes	"Keeping children safe in education Statutory guidance for schools and colleges September 2023"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children December 2023"	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	SECURE DISPOSAL – these records MUST be shredded				

Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule.

Atten	Attendance									
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record					
5.2.1	Attendance registers	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	SECURE DISPOSAL					
5.2.2	Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL					

Specia	Special Educational Needs								
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record				
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time in order to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period – this should be documented				
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold				
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold				

Specia	pecial Educational Needs								
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record				
5.3.4	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold				

Statis	Statistics and Management Information								
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record				
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL				
6.1.2	Examination results (schools copy)	Yes		Current year + 6 years	SECURE DISPOSAL				
	SATs records –	Yes							

Statistics and Management Information Basic file description Statutory **Retention Period [Operational]** Action at end of Data **Protection Provisions** administrative life of the record Issues The SATS results should be recorded on SECURE DISPOSAL Results the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison The examination papers should be kept SECURE DISPOSAL Examination until any appeals/validation process is papers complete **Published Admission** 6.1.3 Yes Current year + 6 years SECURE DISPOSAL Number (PAN) reports 6.1.4 Value added and Yes Current year + 6 years SECURE DISPOSAL contextual data 6.1.5 | Self-evaluation forms Yes Current year + 6 years SECURE DISPOSAL

Imple	Implementation of Curriculum								
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record				
6.2.1	Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL				
6.2.2	Timetable	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL				
6.2.3	Class record books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL				
6.2.4	Mark books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL				
6.2.5	Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL				

Imple	mplementation of Curriculum								
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record				
6.2.6	Pupils' work	No		Where possible, work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year	SECURE DISPOSAL				

Educ	ducational Visits outside the Classroom									
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record					
7.1.1	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Primary schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 – "Legal Framework and Employer Systems" and Section 4 – "Good Practice".	Date of visit + 14 years	SECURE DISPOSAL					

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
7.1.2	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Secondary schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 – "Legal Framework and Employer Systems" and Section 4 – "Good Practice".	Date of visit + 10 years	SECURE DISPOSAL
7.1.3	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	
7.1.5	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL

Wa	Walking Bus									
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record					
7.2	1 Walking bus registers	Yes		Date of register + 3 years. This takes into account the fact that, if there is an incident requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]					

This section covers records created in the course of interaction between the school and the LA.

Local	Local Authority								
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record				
8.1.1	Secondary transfer sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL				
8.1.2	Attendance returns	Yes		Current year + 1 year	SECURE DISPOSAL				
8.1.3	School census returns	No		Current year + 5 years	SECURE DISPOSAL				

Central Government							
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record		
8.2.1	OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL		
8.2.2	Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL		
8.2.3	Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL		

Appendix 2 Record retention audit

Sample Record Retention Audit Questionnaire for Staff:

Staff job title:	
Date of Audit:	
Name of Auditor:	
Auditor's iob title:	

Please ensure you answer all the questions below independently.

- 1. I can locate policies relating to data retention and know who in my academy can assist with questions?
- 2. Routine emails not relating to pupils, safeguarding or another legitimate reason should be retained for no longer than?
- 2a. Do you have emails older than this period? If yes, approximately how many emails?
- 3. Do you know your academies policy/procedure on deleting confidential data?
- 3b. Can you please outline what the process is?
- 4. How often do you review the documents you manage?
- 5. [Insert a question regarding retention that is specific to the staff members role.] For example, a teaching staff member could be asked, 'how long we are required to keep Pupil's work?'

Any questions about this policy should be directed to you Data Protection Lead or OAT Data Protection Officer: dpo@ormistonacademies.co.uk