



Bishop Chadwick

Catholic Education Trust

Data Retention Policy and Schedule

April 2025

Agreed by Directors:
Review Date:

Summer 2021
April 2027

Table of Contents

| | |
|---|----|
| REVISION HISTORY | 3 |
| 1. PURPOSE | 4 |
| 2. SCOPE | 4 |
| 3. RISK APPETITE | 4 |
| 4. COMPLIANCE | 5 |
| 5. RESPONSIBILITIES: RECORD OWNERS | 6 |
| 6. TRAINING | 6 |
| 7. MONITORING | 7 |
| 8. DOCUMENT APPROVAL..... | 8 |
| 9. ANNEX A – DATA RETENTION SCHEDULE | 9 |
| 1. MANAGEMENT OF THE TRUST/SCHOOL | 9 |
| 2. HUMAN RESOURCES | 20 |
| 3. FINANCIAL MANAGEMENT OF THE SCHOOL | 25 |
| 4. PROPERTY MANAGEMENT | 30 |
| 5. PUPIL MANAGEMENT..... | 31 |
| 6. CURRICULUM MANAGEMENT | 35 |
| 7. EXTRA CURRICULUM MANAGEMENT | 36 |
| 8. CENTRAL GOVERNMENT AND LOCAL AUTHORITY | 38 |

Revision History

The below table provides the revision history for this document. Each revision has an associated date, issue number, and description of the changes and/or content. The document revisions appear in descending order, with the most recent iteration appearing first in the table.

| Date | Version | Description | Author |
|------------|---------|---|-----------------------------|
| 3/12/2020 | 0.a | Initial Draft | Sarah Burns, Data2Action |
| 7/5/2021 | 0.b | Final draft | Sarah Burns, Data2Action |
| 11/5/2021 | V1.0 | Signed off by Directors | Sarah Burns, Data2Action |
| 28/01/2025 | V2.0 | Multiple changes in line with IRMS/DfE guidance and recent changes to Pupil Registration/ Attendance regulations. | Sarah Burns, Data2Action |

1. Purpose

The purpose of this Policy is to ensure that all employees and associated third parties of the Bishop Chadwick Catholic Education Trust ('the Trust', including all associated schools) understand the requirements set out in the GDPR, Data Protection Act 2018 and other associated legislation in relation to the retention of records created and stored within the Trust.

When applying this policy, consideration should also be given to other legislation which may govern and inform the Trusts decisions regarding the duration in which records are to be retained. Whilst not an exhaustive list, the following are key legislation which the Trust is required to comply with in this regard:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018 (DPA)
- Privacy and Electronic Communications Regulations (PECR) 2003
- Freedom of Information Act 2000 (FOIA)
- Section 46 Code of Practice - Records Management
- Keeping Children Safe in Education 2020
- Employment Act 2008

The Trust strives to ensure it delivers fair outcomes for its pupils and staff and shall not knowingly or intentionally breach any applicable law or regulation relevant to the conduct of its activities. The Trust is committed to the highest standards of ethical conduct and integrity and is dedicated to acting in an open and honest manner when dealing with both pupils, parents, governors and employees.

This Policy should be read in conjunction with the wider suite of compliance policies which exist to provide a structure for staff to work within and remain compliant with Data Protection legislation. This Policy does not contain an exhaustive set of requirements. Employees of the Trust should always comply with the guidance within this Policy, the overriding objective of which is to protect Personal Data held by the Trust.

2. Scope

This policy and the Data Retention Schedule (Annex A) specify the retention and disposal requirements that apply to all records held by the Trust, regardless of the form they take i.e. paper, electronic records, audio etc. This includes, but is not limited to education records, letters, emails, recorded telephone calls, attendance notes, financial information (such as statements or invoices), reports, legal documents (such as contracts and deeds), meeting minutes and photographs etc.

3. Risk Appetite

The Bishop Chadwick Catholic Education Trust has no appetite for regulatory breaches or breaches of this policy and related procedures.

4. Compliance

Determining appropriate retention periods

In determining the retention periods, consideration is given to:

- The business purpose and requirements attributed to the record
- The need to comply with any applicable statutory or regulatory retention requirements
- Records of public interest or for historical, scientific or statistical purposes or
- The Trust's need to exercise its legal rights and/or defend against legal claims.

The Trust is required under data protection laws to ensure that records containing personal data are not retained in a form which enables the identification of individuals for any longer than is necessary for the purposes for which the personal data have been collected. The Trust must be able to justify the retention of personal data to the authority responsible for enforcing data protection laws (in the UK, the ICO).

In practice this means the Trust must not retain the personal data contained within pupil, employee, supplier or any other records for any longer than is necessary. The Trust takes a proportionate approach to data retention, balancing the needs of the Trust with the impact of retention on the Data Subjects' privacy.

The Trust also needs to comply with all other aspects of data protection laws in relation to the personal data retained, including ensuring that its retention is fair and lawful and that it is secured by appropriate technical and organisational measures against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

There may be circumstances where the data is no longer needed to fulfil its original stated purpose. Where this is the case, it may be appropriate to delete the record prior to its given retention period. Care must be taken however in first assessing the record, as deletion of personal data which should be retained, could in fact be the subject of a data breach.

In some instances, statutory requirements will dictate a retention period, for example pupil education records must be retained for 25 years from the year of birth, or records regarding salary or pension payments must be retained for current year plus 6 years, where this is the case, the statutory timescale must be adhered to. The Trust Data Retention Schedule (Annex A) details the retention period for all records, which takes into consideration both statutory and organisational retention periods.

Retaining data beyond its retention period

Personal Data may also be retained for a longer period if it is solely for archiving purposes where it is in the public interest, for scientific purposes, historical research purposes or statistical purposes, in accordance with Article 89(1) of the GDPR.

Where a record is subject to a legal claim, audit or investigation, it may be retained for a longer period than that stated in the retention schedule. Where this is the case, details of the reason should be recorded and where the record includes personal data, only the specific personal data which is required to be retained to meet the legal claim, audit or investigation should be retained. Records containing this data must be moved from a live environment to

a secure archive that is subject to appropriate security and restricted access. Once the record is no longer needed, it is the responsibility of the record owner to ensure it is securely and permanently deleted, disposed of or anonymised. Guidelines for statutory periods for making a legal claim are detailed in the Limitations Act 1980 and should be used as a guide when retaining records for this purpose.

5. Responsibilities: Record Owners

Organisational measures to manage record retention periods

Record owners are responsible for ensuring that all records within their control are retained and disposed of in accordance with this policy and the Data Retention Schedule (Annex A). Measures must be implemented to ensure retention periods are managed in accordance with the retention schedule. Prior to the retention date a review of the record should be carried out to determine whether the record should be destroyed or retained further.

Secure disposal of records

Where there is no requirement to retain the record, the information owner must ensure it is securely and permanently deleted or disposed of in accordance with this policy or where appropriate, that it is anonymised.

Data anonymisation is the process by which personal data is irreversibly altered in such a way that a data subject can no longer be identified directly or indirectly. Personal data must be anonymised if it is to be used for a purpose other than which it was collected (i.e. statistical purposes where the identity of an individual is not required). Anonymisation must be applied to all associated datasets and records, including any back-ups or duplicate copies of the personal data.

Records must be deleted or destroyed securely and in a way that protects the confidentiality and integrity of the Trust and the rights and privacy of the data subjects. Specific care must be taken over the disposal of any Trust confidential, sensitive or confidential personal data. The following secure methods of destruction must be adopted:

- Electronic records should be deleted with a secure deletion utility that ensures the information cannot be retrieved. Standard deletion utilities that only remove the file pointer should not be used.
- Personal data on hard drives, removable media and any similar items must be securely erased before any disposal or reassignment of the equipment.
- Where personal data cannot be erased from equipment, it must be physically destroyed by an authorised, specialist destruction company, and certificates of destruction must be obtained.
- Paper copies must be destroyed using cross-cut shredders or disposed of securely as 'confidential waste' by an approved third party.

6. Training

All employees must undergo GDPR training which outlines their responsibilities under this Policy. Trust employees will undergo this training upon induction into the Trust and undergo

refresher training on a regular basis (at least annually). A record of individual training completion must be logged and retained in employee files or a centralised file.

7. Monitoring

Monitoring to assess the adherence to and effectiveness of this policy will be completed by the leadership team in each school and appointed personnel within the central Trust team. Monitoring should be conducted on a regular basis, but no less than once annually to ensure the Data Retention Schedule captures all identified required data.

8. Document Approval

| | | |
|---|---|-------------|
| Document Name | Data Retention Policy and Schedule | |
| Publication Date | | |
| Prepared by | Sarah Burns, Data2Action | |
| Approval (Name & Organization) | | Sign |

9. Annex A – Data Retention Schedule

The retention periods below must be adhered to with appropriate organisational measures implemented to ensure records are reviewed periodically and decisions made as to their ongoing retention (where the data is part of a legal claim, audit or investigation), destruction or permanent preservation with The National Archives (TNA).

1. Management of the Trust/School

This section contains retention periods connected to the general management of the school. This covers the work of the Directors, Executive Team, Local Governing Committee, the Headteacher and the senior management team, the admissions process and operational administration.

| 1.1 Governance: Directors, local committees, and sub committees | | | | |
|--|--|--|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 1.1.1 | Agendas for Directors, Local Governor Committees and Sub-Committee meetings | There may be data protection issues if the meeting is dealing with confidential issues relating to staff | Principle copy must be retained with the master set of minutes. Permanent retention | Archive either in physical permanent storage or electronic archive filing system. Secure and permanent disposal of all surplus copies. |
| 1.1.2 | Minutes from Directors, Local Governor Committees and Sub-Committee meetings | There may be data protection issues if the meeting is dealing with confidential issues relating to staff | Principle copy must be retained with the master set. Permanent retention | Archive either in physical permanent storage or electronic archive filing system. Secure and permanent disposal of all surplus copies. |
| 1.1.3 | Reports presented to the Directors, Local Governor Committees and Sub-Committee meetings | There may be data protection issues if the report deals with confidential issues relating to staff | Principle copy should be retained with the master set of minutes. Permanent retention | Archive either in physical permanent storage or electronic archive filing system. Secure and permanent disposal of all surplus copies |
| 1.1.4 | Articles of Association (NB it is mandatory that the Articles of Association are | No | Permanent retention | Retained centrally within the Trust. |

| | | | | |
|-------|---|-----|--|---|
| | published on Trust website) | | | |
| 1.1.5 | Trusts and Endowments managed by the Directors and Local Governing Committee | No | Permanent retention | Retained centrally within the Trust. |
| 1.1.6 | Policy documents created and administered by the Local Governing Committee | No | Life of the policy | Secure disposal |
| 1.1.7 | Records relating to formal complaints | Yes | Date of resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes. If negligence current year + 15 years; if child protection or safeguarding case current year + 40 years | Secure disposal |
| 1.1.8 | Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies. Decisions and associated documents tabled at FGC/ LGC and retained in line with approved minutes | No | One copy should be retained with the master set of minutes. All other copies can be disposed of. Permanent retention | Archive either in physical permanent storage or electronic archive filing system. Secure and permanent disposal of all surplus copies. |

| | | | | |
|--------|---|-----|--|--|
| 1.1.9 | Constitution | No | Date constitution superseded + 10 years . It may be appropriate to retain one copy of each constitution for archival purposes | If retaining for archive purposes, store in permanent storage (physical or electronic). If not retained, secure and permanent disposal. |
| 1.1.10 | Governance Statement | No | Life of governance statement + 6 years . One copy of each iteration may need to be retained for archive purposes | If retaining for archive purposes, store in permanent storage (physical or electronic). If not retained, secure and permanent disposal. |
| 1.1.11 | Written Scheme of Delegation | Yes | Life of Written Scheme of Delegation + 10 years | Secure disposal |
| 1.1.12 | Special Resolutions to amend the Constitution | Yes | Date constitution superseded + 10 years . It may be appropriate to retain one copy of each constitution for archival purposes | If retaining for archive purposes, store in permanent storage (physical or electronic). If not retained, secure and permanent disposal. |

| | | | | |
|--------|---|-----|---|-----------------|
| 1.1.13 | Register of Directors | Yes | Date Director resigns + 10 years | Secure disposal |
| 1.1.14 | Appointment of Trustees and Governors and Directors | Yes | Life of appointment + 6 years | Secure disposal |
| 1.1.15 | Records relating to the election of parent and staff governors not appointed by the governors | Yes | Date of election + 6 months | Secure disposal |
| 1.1.16 | Records relating to the appointment of co-opted governors | Yes | Record in minutes. Retain all other records relating to appointment once the co-opted governor has finished their term of office except where there have been allegations concerning children. In this case retain for 25 years. | Secure disposal |

| | | | | |
|--------|--|-----|---|---|
| 1.1.17 | Records relating to the terms of office of serving governors including evidence of appointment | Yes | Date appointment ceases + 6 years except where there have been allegations concerning children. In this case retain for 25 years. | Secure disposal |
| 1.1.18 | Records relating to Governor Declaration against disqualification criteria | Yes | Date appointment ceases + 6 years | Secure disposal |
| 1.1.18 | Governors Code of Conduct | No | This is expected to be a dynamic document, one copy of each version should be kept for the life of the organisation | Archive either in physical permanent storage or electronic archive filing system. Secure and permanent disposal of all surplus copies. |
| 1.1.19 | Records relating to DBS checks carried out on clerk and members of the governing body. | Yes | Date of DBS check + 6 months Date of DBS to be recorded and retained. | Secure disposal |

| | | | | |
|--------|--|-----|---|-----------------|
| 1.1.20 | Records relating to the induction programme for new governors | Yes | Date appointment ceases + 6 years | Secure disposal |
| 1.1.21 | Records relating to the training required and received by Governors | Yes | Date Governor steps down + 6 years | Secure disposal |
| 1.1.22 | Register of members | Yes | Date Member resigns + 10 years | Secure disposal |
| 1.1.23 | Register of Trustees interests | Yes | Date Trustee resigns + 10 years | Secure disposal |
| 1.1.24 | Declaration of Interests Statements [Governors] [this is not a statutory register] | Yes | Date Governor resigns + 10 years | Secure disposal |

| 1.2 Head Teacher and Senior Management Team | | | | |
|--|--|--|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 1.2.1 | Minutes of Senior Leadership Team meetings and the meetings of other internal administrative bodies (inc. Head Teacher Board, Secondary Head Teacher Board and Primary Head Teacher Board meetings). | 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 | Electronic records stored on OneDrive. Secure disposal |
| 1.2.2 | Reports created by the Head Teacher or the Leadership Team (excludes Head Teacher/subject head report for Directors Board mtg & School Head Teacher reports for Governor committees – see 1.1.3). | There may be data protection issues if the report refers to individual pupils or members of staff. | Date of the report + 3 years then review | Electronic records stored on OneDrive. Secure disposal |
| 1.2.3 | 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 (dependent upon report type) | Secure disposal |
| 1.2.4 | 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 (dependent upon record) | Both Paper and electronic copies. Secure disposal. |

| | | | | |
|-------|--------------------------|----|---------------------------------------|------------------|
| 1.2.5 | School Improvement Plans | No | Life of the plan + 5 years. | Secure disposal. |
| 1.2.6 | School Evaluation Form | No | Current year + 6 Years | Secure Disposal |
| 1.2.7 | School Development Plan | No | Life of plan + 3 years | Secure Disposal |

| 1.3 Admissions Process | | | | |
|-------------------------------|--|-------------------------------|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 1.3.1 | All records relating to the creation and implementation of the School Admissions' Policy | No | Life of the policy +7 years | Secure disposal |
| 1.3.2 | Admissions – if the admission is successful | Yes | Date of admission + 1 year | Secure disposal |
| 1.3.3 | Admissions – if the appeal is unsuccessful | Yes | Resolution of case + 1 year | Secure disposal |
| 1.3.4 | Admissions Transition File (from Local Authority/ primary school). | Yes | Retained as electronic record with all other pupil records. | Secure disposal |

| | | | | |
|-------|---|-----|---|-----------------|
| 1.3.5 | Register of Admissions (automatic port via DfE secure transfer system). includes new Year 7 intake, in year transfers, managed moves etc. | Yes | <p>Date of birth</p> <p>+6 years. Must be held in electronic format with an audit trail of any amendments made</p> <p>*Arbor does not enable a separate Admissions Register, each entry is recorded against the pupil as part of the Pupil Education Record. As such, it is not currently possible to dispose of the Admission record this is being reviewed, in the meantime retain for the duration of the pupil Education Record (see 5.1.1)</p> | Secure disposal |
|-------|---|-----|---|-----------------|

| | | | | |
|-------|---|-----|--|-------------------|
| 1.3.6 | Admissions – in year/ managed move. | Yes | <p>Current year +6 years. Must be held in electronic format with an audit trail of any amendments made</p> <p>*Arbor does not provide a separate Admissions Register, each entry is recorded against the pupil as part of the Pupil Education Record. As such, it is not currently possible to dispose of the Admission record. This is being reviewed, in the meantime retain for the duration of the Pupil Education Record (see 5.1.1)</p> | Secure disposal |
| 1.3.7 | Proofs of address / baptism/ religious certificate/evidence supplied by parents as part of the admissions process | Yes | Current year + 1 year | Secure disposal |
| 1.3.8 | Published Admission Number (PAN) Reports | No | Current year + 6 years | Standard disposal |
| 1.3.9 | Records relating to the management of exclusions | Yes | DOB + 25 years (held with the pupil Record) | Secure disposal |

| 1.4 Operational Administration | | | | |
|---------------------------------------|--|-------------------------------|---------------------------------------|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 1.4.1 | General file series. | No | Current year + 5 years then | Secure disposal |
| 1.4.2 | Records relating to the creation and publication of the school brochure or prospectus. | No | Current year + 3 years | Standard disposal |
| 1.4.3 | Records relating to the creation and distribution of circulars to staff, parents, or pupils. (e.g., factual updates such as lunch rota updates etc.). | No | Current year + 1 year | Standard disposal |
| 1.4.4 | Newsletters and other items with a short operational use. | No | Current year + 1 year | Standard disposal |
| 1.4.5 | Visitors' Books and Signing in Sheets. | Yes | Current year + 6 years | Secure disposal |
| 1.4.6 | Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations. | No | Current year + 6 years then | Secure disposal |

2. Human Resources

This section deals with all matters of Human Resources management within the school.

| 2.1 Recruitment | | | | |
|------------------------|---|-------------------------------|--|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 2.1.1 | All records leading up to the appointment of all staff – successful candidates | Yes | Appointed staff - duration of employment + 6 years All information should be added to the staff personal file | Secure disposal |
| 2.1.2 | All records leading up to the appointment of a new member of staff – unsuccessful candidates | Yes | Date of recruitment process + 1 year | Secure disposal |
| 2.1.3 | In line with Keeping Children Safe in Education: Pre-employment vetting information – (e.g. DBS Checks, medical checks, criminal record risk assessment, references, oversees police check, qualifications, proof of ID) | No | Appointed staff - duration of employment + 6 years All information should be added to the staff personal file Unsuccessful candidates - Date of recruitment process + 1 year NB: The school must <u>not</u> keep copies of DBS certificates. | Secure disposal |

| | | | | |
|-------|--|-----|---|---|
| 2.1.4 | Single central record | Yes | At point of leaving employment | Secure disposal |
| 2.1.5 | Pre-employment vetting information – Evidence proving the right to work in the United Kingdom, including Visas, work permits and certificate of sponsorship. | Yes | These documents must be added to the Staff Personal File Employment + 6 years | Mix of paper and electronic. Secure disposal |

| 2.2 Operational Staff Management | | | | |
|---|--|-------------------------------|--|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 2.2.1 | Staff Personal File. | Yes | Termination of Employment + 6 years NB: If transfer within Trust, file needs to move to new school (not to be classed as leaver). | Secure disposal |
| 2.2.2 | Timesheets. | Yes | Current year + 6 years | Secure disposal |
| 2.2.3 | Annual appraisal/ performance management and quality assurance/ teacher lesson observations/ CPD records. | Yes | Current year + 6 years NB: Must not be held in personal file. | Secure disposal |
| 2.2.4 | Request for authorised leave (i.e., medical appointment). Hospital notices/ evidence of appt etc. to be deleted once decision made. | Yes | 3 years from request. NB: Must not be held in personal file. | Secure disposal. Paper and electronic copies. |

| 2.3 Management of Disciplinary and Grievance Processes | | | | |
|---|---|-------------------------------|---|--|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 2.3.1 | Allegation of a child protection nature against a member of staff including where the allegation is unfounded | Yes | All records to be placed in a sealed envelope with the destruction date added . To be kept in the staff personal file Retained until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer | Secure and permanent disposal These records must be shredded or securely disposed of |
| 2.3.2 | Disciplinary Proceedings (conduct, capability, absence) | Yes | Oral warning – date of warning + 6 months First written warning – date of warning + 6 months Second written warning – date of warning + 1 year Final Written Warning – date of warning + 18 months Case not found – upon conclusion of hearing NB: Note to be placed on file to show date sanction is spent. | Secure disposal |
| 2.3.3 | Grievance/ harassment and bullying allegation | Yes | Investigation and outcome held on personal file (person making allegation) If upheld, record then falls in line with disciplinary retention periods. | Secure disposal |

| 2.4 Health and Safety | | | | |
|------------------------------|---|-------------------------------|--|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 2.4.1 | Health and Safety Policy Statements | No | Life of policy + 1 year | Secure disposal |
| 2.4.2 | Health and Safety Risk Assessments School level | No | Life of risk assessment + 3 years | Secure disposal |
| 2.4.3 | Records relating to accident/ injury at work – school and Trust (depending upon claim) | Yes | Date of incident + 20 years In the case of serious accidents, a further retention period will need to be applied | Secure disposal |
| 2.4.4 | Accident Reporting Adults Children | Yes | Date of the incident + 7 years Date of incident + 7 years | Secure disposal |
| 2.4.5 | Control of Substances Hazardous to Health (COSHH) | No | Current year + 10 years | Secure disposal |
| 2.4.6 | Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos Exposure | No | Last action + 40 years | Secure disposal |
| 2.4.7 | Process of monitoring of areas where employees and persons are likely to have become in contact with radiation | No | Last action + 50 years | Secure disposal |

| | | | | |
|--------|--|-----|--|---------------------|
| 2.4.8 | Fire Precautions logbooks, Tests, checks, emergency evacuations (school level) | No | Current year + 6 years | Secure disposal |
| 2.4.9 | Contract operation and monitoring (e.g. Service level agreements, compliance records) | No | Destroy 2 years after the terms of contract have expired | Secure disposal |
| 2.4.10 | Plans, Inspections and Associated Architectural Services (Equipment inspection records. Risk assessments). | No | Current year + 6 Years | Secure Disposal |
| 2.4.11 | Training (occupational health and safety training) | Yes | Individual course assessment records should be destroyed once the training has been renewed every 3 years . | Secure Disposal |
| 2.4.12 | Planning Consents and Correspondence – Alterations to buildings, new buildings (eg planning applications, approval letters etc). | No | Permanent retention | Permanent retention |
| 2.4.13 | Legionella Water sampling records | | 5 years | Secure Disposal |

| 2.5 Payroll and Pensions | | | | |
|---------------------------------|------------------------|------------------------|--|--|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 2.5.1 | Maternity pay records | Yes | Held on file for duration of employment + 6 years | Secure disposal |

| | | | | |
|-------|---|-----|-------------------------------|-----------------|
| 2.5.2 | Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995. (Inc ill health retirement) | Yes | Current year + 6 years | Secure disposal |
|-------|---|-----|-------------------------------|-----------------|

3. Financial Management of the School

This section deals with all aspects of the financial management of the school including the administration of school meals

| 3.1 Risk Management and Insurance | | | | |
|-----------------------------------|---|------------------------|---|--|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 3.1.1 | Employer's Liability Insurance Certificate (To be held centrally within Trust) | No | Year of issue + 40 years . If schools closure copy to be sent to the Local Authority | Secure disposal |
| 3.1.2 | Public Liability Insurance (To be held centrally within Trust) | No | Year of issue + 40 years | Secure disposal |
| 3.1.3 | Insurance policies (To be held centrally within Trust) | No | Date policy expires + 6 years | Secure disposal |
| 3.1.4 | Records relating to settlement of claim | Yes | Date claim settled + 6 years | Secure Disposal |

| 3.2 Asset Management | | | | |
|-----------------------------|---|-------------------------------|---------------------------------------|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 3.2.1 | Inventories of furniture and equipment | No | Current year + 6 years | Secure disposal |
| 3.2.2 | Burglary, theft, and vandalism report forms | No | Current year + 6 years | Secure disposal |

| 3.3 Accounts and Statements including Budget Management | | | | |
|--|--|-------------------------------|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 3.3.1 | Annual Accounts | No | Current year + 6 years | Standard disposal |
| 3.3.3 | Student Grant applications | Yes | Current year + 6 years (included as part of pupil file) | Secure disposal |
| 3.3.4 | All records relating to the creation and management of budgets including the Annual Budget statement and background papers (Trust level) | No | Life of the budget + 3 years | Secure disposal |
| 3.3.5 | Invoices, receipts, order books and requisitions, delivery notices | No | Current financial year + 6 years | Secure disposal |
| 3.3.6 | Records relating to the collection and banking of monies | No | Current financial year + 6 years | Secure disposal |
| 3.3.7 | Records relating to the identification and collection of debt | No | Current financial year + 6 years | Secure disposal |

| 3.4 Contract Management | | | | |
|--------------------------------|---|-------------------------------|--|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 3.4.1 | All records relating to the management of contracts under seal | No | Last payment on the contract + 12 years | Secure disposal |
| 3.4.2 | All records relating to the management of contracts under signature | No | Last payment on the contract + 6 years | Secure disposal |
| 3.4.3 | Records relating to the monitoring of contracts | No | Current year + 6 years | Secure disposal |

| 3.5 School Fund | | | | |
|------------------------|--------------------------------------|-------------------------------|---------------------------------------|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 3.5.1 | Trust Bank Account - Cheque books | No | Current year + 6 years | Secure disposal |
| 3.5.2 | Trust Bank Account - Paying in books | No | Current year + 6 years | Secure disposal |
| 3.5.3 | Trust Bank Account – Ledger | No | Current year + 6 years | Secure disposal |
| 3.5.4 | Trust Bank Account – Invoices | No | Current year + 6 years | Secure disposal |
| 3.5.5 | Trust Bank Account – Receipts | No | Current year + 6 years | Secure disposal |
| 3.5.6 | Trust Bank Account - Bank statements | No | Current year + 6 years | Secure disposal |
| 3.5.7 | Trust Bank Account – Journey Books | No | Current year + 6 years | Secure disposal |

| 3.6 School Meals | | | | |
|-------------------------|---|-------------------------------|---------------------------------------|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 3.6.1 | Free School Meals Registers where held (file from LA – updated in SIMs) | Yes | Current year + 6 years | Secure disposal |
| 3.6.2 | School Meals Registers (primaries) | Yes | Current year + 3 years | Secure disposal |
| 3.6.3 | School Meals Summary Sheets (payment reconciliation) | No | Current year + 3 years | Secure disposal |

| 3.7 Funding | | | | |
|--------------------|--------------------------------|-------------------------------|--|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 3.7.1 | Pupil Premium Fund records | Yes | Date pupil leaves the provision + 6 years | Secure disposal |
| 3.7.2 | Investment policies | No | Life of the investment + 6 years | Secure disposal |
| 3.7.3 | Management of Endowment Funds | Yes | Life of the fund + 6 years | Secure disposal |
| 3.7.4 | Records relating to loans | No | 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 |
| 3.7.5 | Exclusions agreement (with LA) | Yes | Date of last payment of funding + 6 years | Secure disposal |
| 3.7.6 | Gift Aid and Tax Relief | Yes | Date of last payment of funding + 6 years | Secure disposal |

| | | | | |
|--------|--|-----|--|-----------------|
| 3.7.7 | Funding records | Yes | Date of last payment of funding + 6 years | Secure disposal |
| 3.7.8 | Per pupil funding records | Yes | Date of last payment of funding + 6 years | Secure disposal |
| 3.7.9 | Funding Records General Annual Grant (GAG) | No | Date of last payment of funding + 6 years | Secure disposal |
| 3.7.10 | Funding Records Earmarked Annual Grant (EAG) | No | Date of last payment of funding + 6 years | Secure disposal |
| 3.7.11 | Funding Records Capital Grant | No | Date of last payment of funding + 6 years | Secure disposal |
| 3.7.12 | Funding Agreement Termination of the funding agreement | No | Date of last payment of funding + 6 years | Secure disposal |
| 3.7.13 | Funding Agreement with Secretary of State and supplemental funding agreements. | No | Date of last payment of funding + 6 years | Secure disposal |

4. Property Management

This section covers the management of buildings and property.

| 4.1 Property Management | | | | |
|-------------------------|---|------------------------|--|--|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 4.1.1 | Title deeds of properties belonging to the school (Trust) Any claims on the land, applications for access. | No | Permanent retention These should follow the property unless the property has been registered with the Land Registry | Permanent archiving |
| 4.1.2 | Plans of property belonging to the school (fall within title deeds and associated documents) | No | Permanent retention 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. | Permanent archiving |
| 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, inc licenses, revisions | No | Current financial year + 6 years | Secure disposal |
| 4.1.5 | Lettings | No | Current year + 3 years | Secure Disposal |

| 4.2 Maintenance | | | | |
|------------------------|--|-------------------------------|---------------------------------------|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the 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 logbooks | No | Current year + 10 years | Secure disposal |

5. Pupil Management

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

| 5.1 Pupil's Educational Record | | | | |
|---------------------------------------|---|-------------------------------|---------------------------------------|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 5.1.1 | Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 | | | |

| | | | | |
|-------|------------------------------------|-----|--|---|
| | Primary | Yes | <p>Retain whilst the child remains at the primary school.</p> <p>If the pupil transfers to an independent school, to home schooling, leaves the country, or the onward school is unknown the school should discuss with the Trust Head of Service/ DPO/ local authority about where the file should be stored for the remainder of its statutory retention.</p> <p>*Arbor retention policy sets retention at +6 years after leaving the school. This is due to the need to retain the Admission and Attendance registers for 6 years. This is being reviewed, in the meantime retain for +6 years after the pupil leaves the school.</p> | The file should follow the pupil when he/she leaves the primary school. |
| | Secondary | Yes | <p>Date of Birth of the pupil + 25 years</p> <p>If the pupil transfers to an independent school, to home schooling, leaves the country, or the onward school is unknown the school should discuss with the Trust Head of Service/ DPO/ local authority about where the file should be stored for the remainder of its statutory retention.</p> | Secure disposal |
| 5.1.2 | Examination Results – Pupil Copies | | | |

| | | | | |
|-------|---|-----|---|---|
| | Public | Yes | Current year + 6 years | All uncollected certificates should be returned to the examination board. |
| | Internal | Yes | Current year + 5 years | |
| 5.1.3 | Child Protection information held on pupil file | Yes | 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. |
| 5.1.4 | Child protection information held in separate files | Yes | DOB 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 Local Authority Social Services record). | Secure disposal – these records MUST be shredded |
| 5.1.5 | Records relating to the administration of medicines to pupils | Yes | DOB of the child + 25 years then review. | Secure disposal |

| 5.2 Attendance | | | | |
|-----------------------|-------------------------------|-------------------------------|--|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 5.2.1 | Attendance Registers | Yes | Entry date + 6 years . Must be held in electronic format with an audit trail of any amendments made | Secure disposal |

| | | | | |
|-------|---|-----|--|-----------------|
| 5.2.2 | Correspondence relating to authorized absence | Yes | Current academic year + 2 years | Secure disposal |
|-------|---|-----|--|-----------------|

| 5.3 Special Educational Needs | | | | |
|--------------------------------------|---|-------------------------------|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 5.3.1 | Special Educational Needs files, reviews and Individual Education Plans | Yes | Date of Birth of the pupil + 25 years unless there is a legal hold where records must be retained for + 6 years once the legal action has ceased. | Secure disposal unless the document is subject to a legal hold. |
| 5.3.2 | Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement | Yes | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file], unless there is a legal hold where records must be retained for + 6 years once the legal action has ceased. | Secure disposal unless the document is subject to a legal hold |
| 5.3.3 | Accessibility Strategy | Yes | Date of Birth of the pupil + 25 years unless there is a legal hold where records must be retained for + 6 years once the legal action has ceased. | Secure disposal unless the document is subject to a legal hold |

6. Curriculum Management

| 6.1 Statistics and Management Information | | | | |
|---|---|------------------------|---|--|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the 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 |
| | Pupil results | Yes | Exam results should be recorded on 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 exam results. These could be kept for current year + 6 years to allow suitable comparison | Secure disposal |
| 6.1.4 | Value Added and Contextual Data – full performance data suite | Yes | Current year + 6 years | Secure disposal |

| 6.2 Implementation of Curriculum | | | | |
|----------------------------------|------------------------|------------------------|--------------------------------|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 6.2.1 | Schemes of Work | No | Current year + 1 year | 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 | Secure disposal |
| 6.2.3 | Class Record Books | No | Current year + 1 year | Secure disposal |
| 6.2.4 | Mark Books | No | Current year + 1 year | Secure disposal |
| 6.2.5 | Record homework set | No | Current year + 1 year | Secure disposal |
| 6.2.6 | Pupils' Work | No | Where possible pupils' 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 |

7. Extra Curriculum Management

| 7.1 Educational Visits outside the Classroom | | | | |
|---|---|-------------------------------|---------------------------------------|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 7.1.1 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools | No | Date of visit + 15 years. | Secure disposal |
| 7.1.2 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools | No | Date of visit + 15 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 can be retained for operational purposes, if preferred whilst pupil remains in the school | Secure disposal |
| 7.1.4 | Parental permission slips for school trips – where there has been a major incident | Yes | <p>DOB of the pupil involved in the incident + 25 years or 15 years after the trip depending on whichever is greatest</p> <p>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</p> | Secure disposal |

| 7.2 Family Liaison Officers and Home School Liaison Assistants | | | | |
|---|--|-------------------------------|--|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 7.2.1 | Day Books | Yes | Current year + 2 years then review | Secure disposal |
| 7.2.2 | Reports for outside agencies - where the report has been included on the case file created by the outside agency | Yes | Whilst child is attending school and then destroy | Secure disposal |
| 7.2.3 | Referral forms | Yes | While the referral is current | Secure disposal |
| 7.2.4 | Contact data sheets | Yes | Current year then review, if contact is no longer active then destroy | Secure disposal |
| 7.2.5 | Contact database entries | Yes | Current year then review, if contact is no longer active then destroy | Secure disposal |
| 7.2.6 | Group Registers | Yes | Current year + 2 years | Secure disposal |

8. Central Government and Local Authority

| 8.1 Local Authority | | | | |
|----------------------------|---|-------------------------------|---------------------------------------|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 8.1.1 | Secondary Transfer Sheets | 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 + 6 years | Secure disposal |
| 8.1.4 | Circulars and other information sent from the Local Authority | No | Operational use | Secure disposal |
| 8.1.5 | Destination file | Yes | Current year + 1 year | Secure disposal |

| 8.2 Central Government – | | | | |
|---------------------------------|--|-------------------------------|---------------------------------------|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 8.2.1 | Returns made to central government | No | Current year + 6 years | Secure disposal |
| 8.2.2 | Circulars and other information sent from central government | No | Operational use | Secure disposal |

Recommended Disposal Method

Records must be deleted or disposed of using one of the following secure methods:

Destruction Method: A

Documents retained electronically should be deleted with a secure deletion utility that ensures that the information cannot be retrieved. Standard deletion utilities that only remove the file pointer should not be used.

Note: Files that are moved to the recycle bin stay in those folders until the user empties the recycle bin folder. Once files have been deleted from the recycle bin folder, they are still located in the hard drive and can be retrieved with the right software. Secure delete means to overwrite data in a file when the file has been deleted from your computer.

A Third Party deletion or shredding tool that fully deletes a file by overwriting it multiple times with random data so the file is virtually impossible to recover is the only way to ensure a file containing sensitive or personal data is definitely deleted for example, Eraser or File Shredder.

Destruction Method: B

Personal Data on hard drives, removable media and any similar items must be securely erased before any disposal or reassignment of the equipment.

For Example: Blancco which offers certified, secure data erasure software for a range of IT assets, including laptops, mobile devices, servers, virtual machines, files and more.

Where Personal Data cannot be erased from equipment, it must be physically destroyed by an authorised, specialist destruction company, and certificates of destruction must be obtained.

Destruction Method: C

Paper copies must be destroyed using cross-cut shredders or disposed of securely as 'confidential waste' by an approved third party.