




**Bishop Wilkinson**  
Catholic Education Trust  
Through Christ, in Partnership

# Data Retention Policy and Schedule

<b>Signed by the Chair</b>	
<b>Date Approved by Trust</b>	<b>15 Oct 2021</b>
<b>Statutory Policy</b>	<b>No</b>
<b>Required on Website</b>	<b>No</b>
<b>Review Period</b>	<b>Annual</b>
<b>Next Review Date</b>	<b>Oct 2022</b>
<b>Reviewed by</b>	<b>DPO</b>

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## 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
5/7/2021	0.a	Initial Draft	Sarah Burns, Data2Action
8/09/2021	V1.0	Final draft following stakeholder feedback	Sarah Burns, Data2Action
15/10/21	V2	Approved Version	Sarah Burns, Data2Action/J Ridley

## 1. Purpose

The purpose of this Policy is to ensure that all employees and associated third parties of the Bishop Wilkinson Catholic Education Trust ('the Trust', including all associated schools) understand the requirements set out in the UK 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
- Limitations Act 1980
- Environment Information Regulations 2004

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 Wilkinson 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

<b>Document Name</b>	<b>Data Retention Policy and Schedule</b>	
<b>Publication Date</b>	15/10/21	
<b>Prepared by</b>	Sarah Burns, DPO on behalf of Bishop Wilkinson Catholic Education Trust	
<b>Approval</b> (Name & Organization)	See front cover	

## 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.

### 1. Management of the 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.

<b>1.1 Governance: Directors, local committees, and sub committees</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
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.  <b>Permanent retention</b>	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.  <b>Permanent retention</b>	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.  <b>Permanent retention</b>	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 published on Trust website)	No	<b>Permanent retention</b>	Retained centrally within the Trust.
1.1.5	Trusts and Endowments managed by the Directors and Local Governing Committee	No	<b>Permanent retention</b>	Retained centrally within the Trust.
1.1.6	Policy documents created and administered by the Local Governing Committee	No	<b>Life of the policy</b>	Secure disposal



1.1.7	Records relating to formal complaints	Yes	Date of resolution of the complaint + a minimum of <b>6 years</b> 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 atFGC/ 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.  <b>Permanent retention</b>	Archive either in physical permanent storage or electronic archive filing system.  Secure and permanent disposal of all surplus copies.

<b>1.2 Head Teacher and Senior Management Team</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
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 + <b>3 years</b> then review	Electronic records stored on OneDrive.  Secure disposal
1.2.2	Reports created by the Head Teacher or the Leadership Team ( <b>excludes</b> Head Teacher/subject head report for Directors Board mtg & School Head Teacher reports for Governor committees – <b>see 1.1.3</b> )..	There may be data protection issues if the report refers to individual pupils or members of staff.	Date of the report + <b>3 years</b> 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 + <b>6 years</b> 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 + <b>3 years</b> then review (dependent upon record)	Both Paper and electronic copies.  Secure disposal.
1.2.5	School Improvement Plans	No	Life of the plan + <b>5 years.</b>	Secure disposal.

<b>1.3 Admissions Process</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
1.3.1	All records relating to the creation and implementation of the School Admissions' Policy	No	Life of the policy + <b>3 years then review</b>	Secure disposal
1.3.2	Admissions – if the admission is successful	Yes	Date of admission + <b>1 year</b>	Secure disposal
1.3.3	Admissions – if the appeal is unsuccessful	Yes	Resolution of case + <b>1 year</b>	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	Date of birth + <b>25 years</b>	Secure disposal
1.3.6	Admissions – in year/ managed move.	Yes	Current year + <b>1 year</b>	Secure disposal
1.3.7	Proofs of address / baptism/ religious certificate/evidence supplied by parents as part of the admissions process	Yes	Current year + <b>1 year</b>	Secure disposal
1.3.8	Published Admission Number (PAN) Reports	No	Current year + <b>6 years</b>	Standard disposal

<b>1.4 Operational Administration</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
1.4.1	General file series.	No	Current year + <b>5 years then</b>	Secure disposal
1.4.2	Records relating to the creation and publication of the school brochure or prospectus.	No	Current year + <b>3 years</b>	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 + <b>1 year</b>	Standard disposal
1.4.4	Newsletters and other items with a short operational use.	No	Current year + <b>1 year</b>	Standard disposal
1.4.5	Visitors' Books and Signing in Sheets.	Yes	Current year + <b>6 years</b>	Secure disposal
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations.	No	Current year + <b>6 years then</b>	Secure disposal

## 2. Human Resources

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

<b>2.1 Recruitment</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
2.1.1	All records leading up to the appointment of all staff – successful candidates	Yes	Appointed staff - duration of employment + <b>6 years</b>  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 + <b>1 year</b>	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, overseas police check, qualifications, proof of ID)	No	Appointed staff - duration of employment + <b>6 years</b>  All information should be added to the staff personal file  Unsuccessful candidates - Date of recruitment process + <b>1 year</b>  <b>NB:</b> The school must <u>not</u> keep copies of DBS certificates.	Secure disposal
2.1.4	Single central record	Yes	<b>At point of leaving employment</b>	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 + <b>6 years</b>	Mix of paper and electronic.  Secure disposal

<b>2.2 Operational Staff Management</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
2.2.1	Staff Personal File.	Yes	Termination of Employment + <b>6 years</b>  <b>NB:</b> 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 + <b>6 years</b>	Secure disposal
2.2.3	Annual appraisal/ performance management and quality assurance/ teacher lesson observations/ CPD records.	Yes	Current year + <b>6 years</b>  <b>NB:</b> 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	<b>3 years</b> from request. <b>NB:</b> Must not be held in personal file.	Secure disposal. Paper and electronic copies.
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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 <b>destruction date added</b> . To be kept in the staff personal file  Retained until the person's normal <b>retirement age</b> or <b>10 years</b> from the date of the allegation whichever is the longer	Secure and permanent disposal  <b>These records must be shredded or securely disposed of</b>
2.3.2	Disciplinary Proceedings (conduct, capability, absence)	Yes	Duration of <b>employment + 6 years</b> .  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 + <b>1 year</b>	Secure disposal
2.4.2	Health and Safety Risk Assessments School level	No	Life of risk assessment + <b>3 years</b>	Secure disposal
2.4.3	Records relating to accident/ injury at work – school and Trust (depending upon claim)	Yes	Date of incident + <b>20 years</b>  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 + <b>7 years</b> Date of incident + <b>7 years</b>	Secure disposal
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Current year + <b>10 years</b>	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 + <b>40 years</b>	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 + <b>50 years</b>	Secure disposal
2.4.8	Fire Precautions logbooks, Tests, checks, emergency evacuations (school level)	No	Current year + <b>6 years</b>	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 + <b>6 Years</b>	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 <b>3 years</b> .	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		<b>5 years</b>	Secure Disposal

<b>2.5 Payroll and Pensions</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
2.5.1	Maternity pay records	Yes	Held on file for duration of employment + <b>6 years</b>	Secure disposal
2.5.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995. (Inc ill health retirement)	Yes	Current year + <b>6 years</b>	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

<b>3.1 Risk Management and Insurance</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
3.1.1	Employer's Liability Insurance Certificate  (To be held centrally within Trust)	No	Closure of the school + <b>40 years</b>	Secure disposal

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

<b>3.3 Accounts and Statements including Budget Management</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
3.3.1	Annual Accounts	No	Current year + <b>6 years</b>	Standard disposal
3.3.3	Student Grant applications	Yes	Current year + <b>6 years</b> (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 + <b>3 years</b>	Secure disposal
3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No	Current financial year + <b>6 years</b>	Secure disposal
3.3.6	Records relating to the collection and banking of monies	No	Current financial year + <b>6 years</b>	Secure disposal
3.3.7	Records relating to the identification and collection of debt	No	Current financial year + <b>6 years</b>	Secure disposal

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

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



3.5.6	Trust Bank Account - Bank statements	No	Current year + <b>6 years</b>	Secure disposal
3.5.7	Trust Bank Account – Journey Books	No	Current year + <b>6 years</b>	Secure disposal

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

## 4. Property Management

This section covers the management of buildings and property.

<b>4.1 Property Management</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
4.1.1	Title deeds of properties belonging to the school (Trust)  Any claims on the land, applications for access.	No	<b>Permanent retention</b>  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	<b>Permanent retention</b>  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 + <b>6 years</b>	Secure disposal

4.1.4	Records relating to the letting of school premises, inc licenses, revisions	No	Current financial year + <b>6 years</b>	Secure disposal
4.1.5	Lettings	No	Current year + <b>3 years</b>	Secure Disposal

<b>4.2 Maintenance</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
4.2.1	All records relating to the maintenance of the school carried out by contractors	No	Current year + <b>6 years</b>	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 + <b>10 years</b>	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

<b>5.1 Pupil's Educational Record</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005			
	Primary	Yes	Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school.
	Secondary	Yes	Date of Birth of the pupil + <b>25 years</b>	Secure disposal
5.1.2	Examination Results – Pupil Copies			
	Public	Yes	Current year + <b>6 years</b>	All uncollected certificates should be returned to the examination board.

	Internal	Yes	Current year + <b>5 years</b>	
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 <b>MUST</b> be shredded.
5.1.4	Child protection information held in separate files	Yes	DOB of the child + <b>25 years</b> 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 <b>MUST</b> be shredded

<b>5.2 Attendance</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
5.2.1	Attendance Registers	Yes	Entry date + <b>3 years</b>	Secure disposal
5.2.2	Correspondence relating to authorized absence	Yes	Current academic year + <b>2 years</b>	Secure disposal

<b>5.3 Special Educational Needs</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Date of Birth of the pupil + <b>25 years</b>	Secure disposal.
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 + <b>25 years</b> [This would normally be retained on the pupil file].	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 + <b>3 years</b>	Secure disposal
6.1.2	Examination Results (Schools Copy)	Yes	Current year + <b>6 years</b>	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 <b>25 years</b> .  The school may wish to keep a composite record of all the exam results. These could be kept for current year + <b>6 years</b> to allow suitable comparison	Secure disposal
6.1.4	Value Added and Contextual Data – full performance data suite	Yes	Current year + <b>6 years</b>	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 + <b>1 year</b>	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 + <b>1 year</b>	Secure disposal
6.2.3	Class Record Books	No	Current year + <b>1 year</b>	Secure disposal
6.2.4	Mark Books	No	Current year + <b>1 year</b>	Secure disposal
6.2.5	Record homework set	No	Current year + <b>1 year</b>	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 + <b>1 year</b>	Secure DISPOSAL

## 7. Extra Curriculum Management

<b>7.1 Educational Visits outside the Classroom</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom–Primary Schools	No	Date of visit + <b>14 years</b>	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 + <b>10 years</b>	Secure disposal
7.1.3	Parental consent forms for school trips where there has been no major incident	Yes	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	DOB of the pupil involved in the incident + <b>25 years</b>  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	Secure disposal

<b>7.2 Family Liaison Officers and Home School Liaison Assistants</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
7.2.1	Day Books	Yes	Current year + <b>2 years then review</b>	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	<b>Whilst child is attending school and then destroy</b>	Secure disposal
7.2.3	Referral forms	Yes	<b>While the referral is current</b>	Secure disposal
7.2.4	Contact data sheets	Yes	<b>Current year</b> then review, if contact is no longer active then destroy	Secure disposal
7.2.5	Contact database entries	Yes	<b>Current year</b> then review, if contact is no longer active then destroy	Secure disposal

7.2.6	Group Registers	Yes	Current year + 2 years	Secure disposal
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## 8. Central Government and Local Authority

<b>8.1 Local Authority</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
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

<b>8.2 Central Government –</b>				
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
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.