

# **Hadrian Learning Trust**

## **Retention and Disposal of Data**

### **Policy and Procedures**

**June 2025**

Next annual update: 15/06/26

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## Introduction

### Purpose of Procedure Document

This procedure document is intended to support Hadrian Learning Trust's support team in the safe and effective management of the retention and disposal of online / server centred data and hard copy information in line with GDPR and DfE requirements.

As a framework the Trust uses the IRMS '[Academies Toolkit 2019](#)' and the DfE '[Annual review of school records and safe data destruction checklist](#)' as the basis for records management.

To support the retention periods and processes required to deal with both hard copy and soft copy data and publications the Trust uses the 'Annual review of school records and safe data destruction checklist' from the Department for Education.

### Definitions

- IRMS: The Information and Records Management Society' a not-for-profit organisation.
- SECURE DISPOSAL: at Hadrian Learning Trust
  - we use an external contractor who removes from site hard copy secure waste for effective disposal. There are depositary sites for secure waste disposal in the school office.
  - Digital secure disposal requires the wiping of data from the school system, including from:
    - SharePoint
    - The School Management and Information System (Bromcom)
    - The School's hard drive server system and peripheral drives on individual machines.
    - Microsoft Teams
    - Any third party software providers.
- STANDARD DISPOSAL: at Hadrian Learning Trust
  - for hard copies, these should be ripped into quarters and placed in the standard recycling bin.
  - Digital disposal requires the deletion of data from the relevant drive(s) and the subsequent clearing or digital 'bins'.

## Procedures

Each of the following sections is a distinct area of data records held within Hadrian Learning Trust.

Each section of Data and Papers retention identified in this document has a named person (staffing position) with responsibility for the day-to-day management and adherence to these procedures.

Expectations of those staff responsible for the maintenance of this procedure (see Section 16) are as follows:

### Day-to Day:

Operationally staff should be aware of their areas of responsibility.

There should be an attempt to maintain good a accurate records of the data / information held, including where it is held and who has access.

### Annually:

At the end of the academic year, a data purge should be completed lead by those members of staff with areas of responsibly.

The purge should follow the retention guidance given in this document and disposed of, or deleted data should be recorded on the 'List of records and data safety destroyed' record, found in section 17 of this document.

Specific safeguarding records (either hard copy of online) should be forwarded to the Designated Safeguarding Lead.

## Data Retention for the final Academy a pupil is registered with.

It is a DfE requirement that 'the last known or final Academy is responsible for retaining the pupil record', in line with the DfE pupil retention framework.

The Academy is the final or last known Academy if:

A secondary phase and the pupil left at 16 years old or for post-16 or independent education,  
or;

It is an Academy at any point and the pupil left for elective home education, they are missing from education or have left the UK.

The pupil record should be retained as a whole for 25 years from the date of birth of the pupil, after which time, if no longer required for legal or safeguarding purposes, it can be deleted or destroyed. (see section 12 of this document for further details)

Exceptions to this general rule:

- SEN and other support service records can be retained for a longer period of 31 years to enable defence in a "failure to provide a sufficient education" case.
- If a school wishes to retain data for analysis or statistical purposes, it should be done in an anonymised fashion.

Therefore; at Hadrian Learning Trust we hold pupil data on file for 7 years post the cohort departure (at age 18 years) from our 6<sup>th</sup> Form, Year 13. For SEN pupils we hold pupil records for 13 years from the cohort's departure (at age 18 years), from our 6<sup>th</sup> Form, Year 13.

## Data and Papers retention:

### 1. Governance of the Academy Trust:

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
1.1	Governance Statement and Scheme of Delegation	No	Life of governance statement + 6 years	SECURE DISPOSAL <sup>1</sup>
1.2	Articles of Association	No	Life of the Academy	
1.3	Memorandum of Association	No	This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL
1.4	Memorandum of Understanding of Shared Governance among Schools	No	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL
1.5	Constitution	No	Life of the Academy	
1.6	Written Scheme of Delegation	No	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL
1.7	Directors – Appointment	No	Life of appointment + 6 years	SECURE DISPOSAL
1.8	Directors – Disqualification	No	Date of disqualification + 15 years	SECURE DISPOSAL
1.9	Directors – Termination of Office	No	Date of termination + 6 years	SECURE DISPOSAL
1.10	Annual Report – Trustees Report	No	Date of report + 10 years	SECURE DISPOSAL
1.11	Annual Report and Accounts	No	Date of report + 10 years	SECURE DISPOSAL
1.12	Annual Return	No	Date of report + 10 years	SECURE DISPOSAL
1.13	Appointment of Trustees and Directors	Yes	Life of appointment + 6 years	SECURE DISPOSAL
1.14	Statement of Trustees Responsibilities	No	Life of appointment + 6 years	SECURE DISPOSAL
1.15	Appointment and removal of Members	No	Life of appointment + 6 years	SECURE DISPOSAL
1.16	Strategic Review	No	Date of the review + 6 years	SECURE DISPOSAL
1.17	Strategic Plan [also known as School Development Plans]	No	Life of plan + 6 years	SECURE DISPOSAL
1.18	Accessibility Plan	There may be if the plan refers to specific pupils	Life of plan + 6 years	SECURE DISPOSAL

<sup>1</sup> 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.

## 2. Board of Directors and Members Meetings of the Academy Trust:

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	Minutes must be kept for at least 10 years from the date of the meeting <sup>2</sup>	OFFER TO ARCHIVES
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
2.3	Annual Schedule of Business	No	Current year	SECURE DISPOSAL
2.4	Board Meeting: Procedures for conduct of meeting	No	Date procedures superseded + 6 years	SECURE DISPOSAL
2.5	Records relating to the management of General Members' Meetings <sup>3</sup>	Could be if the minutes refer to living individuals	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
2.6	Records relating to the management of the Annual General Meeting	Could be if the minutes refer to living individuals	Minutes must be kept for at least 10 years from the date of the meeting <sup>2</sup>	OFFER TO ARCHIVES
2.7	Register of Directors	No	Life of the Academy + 6 years	SECURE DISPOSAL
2.8	Register of Directors' interests [this is not a statutory register]	No	Life of the Academy + 6 years	SECURE DISPOSAL
2.9	Register of Directors' residential addresses	Yes	Life of the Academy + 6 years	SECURE DISPOSAL
2.10	Register of gifts, hospitality and entertainments	No	Life of the Academy + 6 years	SECURE DISPOSAL
2.11	Register of members	No	Life of the Academy + 6 years	SECURE DISPOSAL
2.12	Register of secretaries	No	Life of the Academy + 6 years	SECURE DISPOSAL
2.13	Register of Trustees interests	No	Life of the Academy + 6 years	SECURE DISPOSAL
2.14	Records relating to complaints dealt with by the Trustees or Directors	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

<sup>2</sup> 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.

<sup>3</sup> Not all Academies are required to hold an Annual General Meeting for the Members – the requirement will be stated in the Constitution.

### 3. Minutes and Records of Meetings of the Academy Trust:

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
3.1	Minutes for 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
3.2	Papers and reports presented in meetings or committees of the Board of Directors or Trustees	May be data protection issues if the meeting is dealing with confidential issues related to staffing.	Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
3.3	Papers and reports presented in meetings or committees of the Board of Directors or Trustees, that are mentioned in the minutes of the meeting	May be data protection issues if the meeting is dealing with confidential issues related to staffing.	Life of the Academy	
3.4	Principle (signed) set of Minutes	May be data protection issues if the meeting is dealing with confidential issues related to staffing.	Life of the Academy	
3.5	Inspection Copies of minutes	May be data protection issues if the meeting is dealing with confidential issues related to staffing.	Date of meeting + 3 years	SECURE DISPOSAL
3.6	Meeting papers relating to the annual parents' meeting held under Section 33 of the Education Act 2002	No	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
3.7	Trusts and Endowments managed by the Trust	No	PERMANENT	
3.8	Trust Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Date of report + 10 years	SECURE DISPOSAL

## 4. Headteacher and Senior Management:

### 4.1 Reports and records for senior managers

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
4.1.2	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
4.1.2	Minutes of Senior Management Team meetings and the 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
4.1.3	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
4.1.4	Records created by head teachers, assistant 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
4.1.5	Correspondence created by head teachers, assistant head teachers, heads of year and other members of staff with admin 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
4.1.6	Professional Development Plans	Yes	Life of the plan + 6 years	SECURE DISPOSAL
4.1.7	School Development Plans	No	Life of the plan + 3 years	SECURE DISPOSAL



## 4.2 Policies, Frameworks and Overarching Requirements

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
4.2.1	Data Protection Policy, including data protection notification	No	Date policy superseded + 6 years	SECURE DISPOSAL
4.2.2	Freedom of Information Policy	No	Date policy superseded + 6 years	SECURE DISPOSAL
4.2.3	Information Security Breach Policy (Within HLT this is section 18 of the Trust Data Protection Policy)	No	Date policy superseded + 6 years	SECURE DISPOSAL
4.2.4	Special Educational Needs Policy	No	Date policy superseded + 6 years	SECURE DISPOSAL
4.2.5	Complaints Policy	No	Date policy superseded + 6 years	SECURE DISPOSAL
4.2.6	Risk and Control Framework	No	Life of framework + 6 years	SECURE DISPOSAL
4.2.7	Rules and Bylaws	No	Date rules or bylaws superseded + 6 years	SECURE DISPOSAL
4.2.8	Home School Agreements	No	Date agreement revised + 6 years	SECURE DISPOSAL
4.2.9	Equality Information and Objectives (public sector equality duty) Statement for publication	No	Date of statement + 6 years	SECURE DISPOSAL

## 5. 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
5.1	Curriculum returns	No	Current year + 3 years	SECURE DISPOSAL
5.2	Examination results (schools copy)	Yes	Current year + 6 years	SECURE DISPOSAL
5.3	SATs records	Yes		
5.3.1	Results	Yes	The SATS 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 whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison.	SECURE DISPOSAL
5.3.2	Examination papers	Yes	The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
5.4	Published Admission Number (PAN) reports	Yes	Current year + 6 years	SECURE DISPOSAL
5.5	Value added and contextual data	Yes	Current year + 6 years	SECURE DISPOSAL
5.6	Self-evaluation forms	Yes	Current year + 6 years	SECURE DISPOSAL

## 6. Admissions Process: Data and Papers retention

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
6.1	All records relating to the creation and implementation of the School Admissions' Policy	No	Life of the policy + 3 years then review	SECURE DISPOSAL
6.2	Admissions – if the admission is successful	Yes	Date of admission + 1 year	SECURE DISPOSAL
6.3	Admissions – if the appeal is unsuccessful	Yes	Resolution of case + 1 year	SECURE DISPOSAL
6.4	Register of Admissions	Yes	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made.	Admission register permanently kept; as often schools receive enquiries from past pupils to confirm the dates they attended the school.
6.5	Admissions – Secondary Schools – Casual	Yes	Current year + 1 year	SECURE DISPOSAL
6.6	Proofs of address supplied by parents as part of the admissions process	Yes	Current year + 1 year	SECURE DISPOSAL
6.7	For successful admissions: Supplementary Information form including additional information such as religion, medical conditions etc	Yes	This information should be added to the pupil file	SECURE DISPOSAL
	For unsuccessful admissions: Supplementary Information form including additional information such as religion, medical conditions etc	Yes	Until appeals process completed	SECURE DISPOSAL

## 7. Operational Administration: Data and Papers retention

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
7.1	General file series	No	Current year + 5 years then REVIEW	SECURE DISPOSAL
7.2	Records relating to the creation and publication of the school brochure or prospectus	No	Current year + 3 years	STANDARD DISPOSAL
7.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No	Current year + 1 year	STANDARD DISPOSAL
7.4	Newsletters and other items with a short operational use	No	Current year + 1 year	STANDARD DISPOSAL
7.5	Visitors' Books and Signing in Sheets	Yes	Current year + 6 years then REVIEW	SECURE DISPOSAL
7.6	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
7.7	Management of complaints	Yes	Date complaint resolved + 3 years	SECURE DISPOSAL

## 8. Human Resources: Data and Papers retention

### 8.1 Recruitment

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
8.1.1	All records leading up to the appointment of new headteacher	Yes	Date of appointment + 6 years	SECURE DISPOSAL
8.1.2	All records leading up to the appointment of a new member of staff – <b>unsuccessful</b> candidates	Yes	Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
8.1.3	All records leading up to the appointment of a new member of staff – <b>successful</b> candidate	Yes	All the relevant information should be added to the staff personal file and all other information retained for 6 mths	SECURE DISPOSAL
8.1.4	Pre-employment vetting information – DBS Checks	No	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months (19/4/24 – awaiting ICO confirmation)	SECURE DISPOSAL
8.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes	Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file	SECURE DISPOSAL
8.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes		SECURE DISPOSAL
8.1.7	Records relating to the employment of overseas teachers	Yes	Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for employment termination plus not less than 2 years	SECURE DISPOSAL
8.1.8	Records related to the TUPE process	Yes	Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL

## 8.2 Payroll and Pensions

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
8.2.1	Maternity pay records	Yes	Current year + 3 years	SECURE DISPOSAL
8.2.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Current year + 6 years	SECURE DISPOSAL
8.2.3	Management of the Teacher's Pension Scheme	Yes	Date of last payment on the pension + 6 years	SECURE DISPOSAL
8.2.4	Payroll records	Yes	Date payroll run + 6 years	SECURE DISPOSAL

## 8.3 Operational Staff Management

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
8.3.1	Staff Personal File, including employment contract and staff training records.	Yes	Termination of Employment + 6 years	SECURE DISPOSAL
8.3.2	Timesheets	Yes	Current year + 6 years	SECURE DISPOSAL
8.3.3	Annual appraisal/ assessment records	Yes	Current year + 5 years	SECURE DISPOSAL
8.3.4	Records relating to agreement of pay and conditions	No	Date pay and conditions superseded + 6 years	SECURE DISPOSAL
8.3.5	Training needs analysis	No	Current year + 1 year	SECURE DISPOSAL

## 8.4 Management of Disciplinary and Grievances Processes

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
8.4.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	<p>Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW.</p> <p>Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned</p>	<p>SECURE DISPOSAL</p> <p>These records must be shredded</p>
8.4.2	Disciplinary Proceedings			
	• oral warning	Yes	Date of warning + 6 months	<p>SECURE DISPOSAL</p> <p>[If warnings are placed on personal files, then they must be weeded from the file]</p>
	• written warning – level 1	Yes	Date of warning + 6 months	
	• written warning – level 2	Yes	Date of warning + 12 months	
	• final warning	Yes	Date of warning + 18 months	SECURE DISPOSAL
	• case not found	Yes	If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	

## 9. Health and Safety: Data and Papers retention

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
9.1	Health and Safety Policy Statements	No	Life of policy + 3 years	SECURE DISPOSAL
9.2	Health and Safety Risk Assessments	No	Life of risk assessment + 3 years	SECURE DISPOSAL
9.3	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
9.4	Control of Substances Hazardous to Health (COSHH)	No	Current year + 40 years	SECURE DISPOSAL
9.5	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Last action + 40 years	SECURE DISPOSAL
9.6	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
9.7	Fire Precautions log books	No	Current year + 6 years	SECURE DISPOSAL
9.8	Fire risk Assessments	No	Life of the risk assessment + 6 years	SECURE DISPOSAL
9.9	Accident Reporting			
	Accident Book (hard copy or electronic)	Yes	Last entry + 3 years.	SECURE DISPOSAL
	Adults	Yes	Date of the incident + 20 years	SECURE DISPOSAL
	Children	Yes	DOB of the child + 25 years	SECURE DISPOSAL



## 10. Financial Management of the Trust:

### 10.1 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
10.1.1	Employer's Liability Insurance Certificate	No	Closure of the school + 40 years	SECURE DISPOSAL
10.1.1	Insurance Policies	No	Date the policy expires + 6 years	SECURE DISPOSAL
10.1.1	Records relating to any insurance claims	No	Date of claim settlement + 6 years	SECURE DISPOSAL

### 10.2 Strategic Finance and Audits

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
10.2.1	Statement of financial activities for the year	No	Current financial year + 6 years	SECURE DISPOSAL
10.2.2	Financial planning	No	Current financial year + 6 years	SECURE DISPOSAL
10.2.3	Value for money statement	No	Current financial year + 6 years	SECURE DISPOSAL
10.2.4	Records relating to the management of VAT	No	Current financial year + 6 years	SECURE DISPOSAL
10.2.5	Whole of government accounts returns	No	Current financial year + 6 years	SECURE DISPOSAL
10.2.6	Borrowing powers	No	Current financial year + 6 years	SECURE DISPOSAL
10.2.7	Budget plan	No	Current financial year + 6 years	SECURE DISPOSAL
10.2.8	Charging and remissions policy	No	Date policy superseded + 3 years	SECURE DISPOSAL
10.2.9	Audit Committee and appointment of responsible officers	No	Life of the Academy	SECURE DISPOSAL
10.2.10	Independent Auditor's report on regularity	No	Financial year report relates to + 6 years	SECURE DISPOSAL
10.2.11	Independent Auditor's report on financial statements	No	Financial year report relates to + 6 years	SECURE DISPOSAL

## 10.3 Funding Agreements

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
10.3.1	Funding Agreement with Secretary of State and supplemental funding agreements	No	Date of last payment of funding + 6 years	SECURE DISPOSAL
10.3.2	Funding Agreement – Termination of the funding agreement	No	Date of last payment of funding + 6 years	SECURE DISPOSAL
10.3.3	Funding Records – Capital Grant	No	Date of last payment of funding + 6 years	SECURE DISPOSAL
10.3.4	Funding Records – Earmarked Annual Grant <a href="#">(EAG)</a>	No	Date of last payment of funding + 6 years	SECURE DISPOSAL
10.3.5	Funding Records – General Annual Grant <a href="#">(GAG)</a>	No	Date of last payment of funding + 6 years	SECURE DISPOSAL
10.3.6	Per pupil funding records	No	Date of last payment of funding + 6 years	SECURE DISPOSAL
10.3.7	LA Payment Exclusions agreement	No	Date of last payment of funding + 6 years	SECURE DISPOSAL
10.3.8	Funding records	No	Date of last payment of funding + 6 years	SECURE DISPOSAL
10.3.9	Gift Aid ad Tax Relief	No	Date of last payment of funding + 6 years	SECURE DISPOSAL
10.3.21	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

## 10.4 Accounts and Statements

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
10.4.1	Annual accounts	No	Current year + 6 years	STANDARD DISPOSAL
10.4.2	Loans and grants managed by the school	No	Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
10.4.3	Student Grant applications	Yes	Current year + 3 years	SECURE DISPOSAL
10.4.4	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No	Life of the budget + 3 years	SECURE DISPOSAL
10.4.5	Invoices, receipts, order books and requisitions, delivery notices	No	Current financial year + 6 years	SECURE DISPOSAL
10.4.6	Records relating to the collection and banking of monies	No	Current financial year + 6 years	SECURE DISPOSAL
10.4.7	Records relating to the management of contracts with external providers	No	Date of last payment on contract + 3 years	SECURE DISPOSAL
10.4.8	Records relating to the management of software licences.	No	Date licence expires + 6 years	SECURE DISPOSAL

## 10.5 School Fund

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
10.5.1	School Fund - Cheque books	No	Current year + 6 years	SECURE DISPOSAL
10.5.2	School Fund - Paying in books	No	Current year + 6 years	SECURE DISPOSAL
10.5.3	School Fund - Ledger	No	Current year + 6 years	SECURE DISPOSAL
10.5.4	School Fund - Invoices	No	Current year + 6 years	SECURE DISPOSAL
10.5.5	School Fund - Receipts	No	Current year + 6 years	SECURE DISPOSAL
10.5.6	School Fund - Bank statements	No	Current year + 6 years	SECURE DISPOSAL
10.5.7	School Fund - Journey Books	No	Current year + 6 years	SECURE DISPOSAL

## 10.6 Asset Management

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
10.6.1	Inventories of furniture and equipment	No	Current year + 6 years	SECURE DISPOSAL
10.6.2	Burglary, theft and vandalism report forms	No	Current year + 6 years	SECURE DISPOSAL
10.6.3	Records relating to the leasing of shared facilities, such as sports centre	No	Current year + 6 years	SECURE DISPOSAL
10.6.4	Land and building valuations	No	Date valuation superseded + 6 years	SECURE DISPOSAL
10.6.5	Disposal of assets	No	Date asset disposed of + 6 years	SECURE DISPOSAL
10.6.6	Community School leases for land	No	Date lease expires + 6 years	SECURE DISPOSAL
10.6.7	Commercial transfer arrangements	No	Date of transfer + 6 years	SECURE DISPOSAL
10.6.8	Transfer of land to the Academy Trust	No	Life of land ownership then transfer to new owner	SECURE DISPOSAL
10.6.9	Transfers of freehold land	No	Life of land ownership then transfer to new owner	SECURE DISPOSAL

## 10.7 Contract Management

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
10.7.1	All records relating to the management of contracts under seal	No	Last payment on the contract + 12 years	SECURE DISPOSAL
10.7.2	All records relating to the management of contracts under signature	No	Last payment on the contract + 6 years	SECURE DISPOSAL
10.7.3	Records relating to the monitoring of contracts	No	Current year + 2 years	SECURE DISPOSAL

## 10.8 School Meals

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
10.8.1	Free School Meals Registers	Yes	Current year + 6 years	SECURE DISPOSAL
10.8.2	School Meals Registers	Yes	Current year + 3 years	SECURE DISPOSAL
10.8.3	School Meals Summary Sheets	No	Current year + 3 years	SECURE DISPOSAL

## 11. Property Management: Data and Papers retention

### 11.1 Property Management

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
11.1.1	Title deeds of properties belonging to the school	No	PERMANENT These should follow the property unless the property has been registered with the Land Registry	
11.1.2	Plans of property belong 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.	
11.1.3	Leases of property (leased by or to the school)	No	Expiry of lease + 6 years	SECURE DISPOSAL
11.1.4	Records relating to the letting of school premises	No	Current financial year + 6 years	SECURE DISPOSAL
11.1.5	Business continuity and disaster recovery plans	No	Date the plan superseded + 3 years	SECURE DISPOSAL

## 11.2 Property Maintenance

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
11.2.1	All records relating to the maintenance of the school carried out by contractors	No	Current year + 6 years	SECURE DISPOSAL
11.2.2	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

## 11.3 Vehicle / Fleet Management

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
11.3.1	The process of acquisition and disposal of vehicles through lease or purchase, eg: contracts / leases, quotes, approvals	No	Disposal of the vehicle + 6 years.	SECURE DISPOSAL
11.3.2	The process of managing allocation and maintenance of vehicles, eg: lists of who was driving the vehicles and when, maintenance and inspection reports	No	Disposal of the vehicle + 6 years.	SECURE DISPOSAL
11.3.3	Service logs and vehicle logs	No	Life of the vehicle, then either to be retained for 6 years by the school or to be returned to the lease company, with records kept of the return.	SECURE DISPOSAL
11.3.4	GPS Tracking Data relating to the vehicle.	No	Date of the journey + 6 years	SECURE DISPOSAL

## 12. Pupil / Student Management:

### 12.1 Educational Records

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
12.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005			
	<ul style="list-style-type: none"> <li>Primary / Middle</li> </ul>	Yes	Retain whilst the child remains at the primary or middle school	The file should follow the pupil when he/she leaves the primary school. <sup>4</sup>
	<ul style="list-style-type: none"> <li>Secondary / High</li> </ul>	Yes	Date of Birth of the pupil + 25 years	SECURE DISPOSAL
12.1.2	Examination Results – Pupil Copies			
	<ul style="list-style-type: none"> <li>Public</li> </ul>	Yes	This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.
	<ul style="list-style-type: none"> <li>Internal</li> </ul>	Yes	This information should be added to the pupil file	
12.1.3	Records relating to the management of exclusions	Yes	Date of birth of the pupil involved + 25 years.	SECURE DISPOSAL
12.1.4	Management of examination registrations	Yes	The examination board will usually mandate how long these records need to be retained.	SECURE DISPOSAL
12.1.5	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
12.1.6	Child protection information held in separate files	Yes	DOB of the child + 25 years then review. <sup>5</sup>	SECURE DISPOSAL – these records MUST be shredded

<sup>4</sup> This will include: (i) to another primary school (ii) to a secondary school (iii) to a pupil referral unit (iv) If the pupil dies whilst at primary school the file should be returned to the Local Authority 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 Local Authority 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 Local Authority as it is more likely that the pupil will request the record from the Local Authority

<sup>5</sup> 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

## 12.2 Attendance

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
12.2.1	Attendance Registers	Yes	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL
12.2.2	Correspondence relating to authorized absence	Yes	Current academic year + 2 years	SECURE DISPOSAL

## 12.3 Special Educational Needs

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
12.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Date of Birth of the pupil + 25 years	<p>REVIEW</p> <p>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 to defend themselves in a “failure to provide a sufficient education” case.</p> <p>There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.</p>
12.3.2	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]	SECURE DISPOSAL unless the document is subject to a legal hold



12.3.3	Advice and information provided to parents regarding educational needs	Yes	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
12.3.4	Accessibility Strategy (individual student strategy)	Yes	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

### 13. Curriculum Management:

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
13.1	Curriculum returns	No	Current year + 3 years	SECURE DISPOSAL
13.2	Examination Results (Schools Copy)	Yes	Current year + 6 years	SECURE DISPOSAL
	SATS records, see 5.3			
13.3	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
13.4	Timetable	No	Current year + 1 year	
13.5	Class Record Books	No	Current year + 1 year	
13.6	Mark Books	No	Current year + 1 year	
13.7	Record homework set	No	Current year + 1 year	
13.8	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

## 14. Extra-Curriculum Management:

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
14.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom	No	Year 5 + 6: Date of visit + 14 years All other years: Date of visit + 10 years	SECURE DISPOSAL
14.2	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 DOB + 22 years, the requirement for them being needed is low.
14.3	Parental permission slips for school trips – where there has been a major incident	Yes	DOB 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
14.4	Records relating to residential trips	Yes	Date of birth of the youngest pupil involved + 25 years	SECURE DISPOSAL

## 15. Central and Local Government requirements:

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
15.1	Secondary Transfer Sheets (Primary to Secondary)	Yes	Current year + 2 years	SECURE DISPOSAL
15.2	Attendance Returns	Yes	Current year + 1 year	SECURE DISPOSAL
15.3	School Census Returns	No	Current year + 5 years	SECURE DISPOSAL
15.4	OFSTED reports and papers	No	Life of the report then REVIEW	SECURE DISPOSAL
15.5	Returns made to central government	No	Current year + 6 years	SECURE DISPOSAL
15.6	Circulars and other information sent from central government	No	Operational use	SECURE DISPOSAL