

# Leading Learners Multi Academy Trust



## Data Protection and Data Retention Policy

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## **Data Protection**

The Board of Trustees are responsible for implementation of this Data Protection Policy. The purpose of this policy is to make you aware of how we handle your personal data.

### **1 Background**

- 1.1 The Data Protection Act 2018 is the law that protects personal privacy and upholds individual's rights. It applies to anyone who handles or has access to people's personal data.
- 1.2 The Academy Trust collects and uses personal information about staff, pupils, parents/carers and other individuals who come into contact with the Academy Trust. This information is gathered in order to enable it to provide education and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that the Academy Trust complies with its statutory obligations.
- 1.3 The Board of Trustees as a corporate body is the Data Controller under the DP Act and has a duty to be registered, as Data Controllers, with the Information Commissioner's Office (ICO) detailing the personal information it holds and its use. These details are then available on the ICO's website at the following link: [http://www.ico.gov.uk/what\\_we\\_cover/promoting\\_data\\_privacy/keeping\\_the\\_register.aspx](http://www.ico.gov.uk/what_we_cover/promoting_data_privacy/keeping_the_register.aspx)
- 1.4 The Academy Trust must also let you know how we use your information and we issue a Privacy Notice to all pupils/parents/carers; this summarises the information held on pupils/parents/carers/staff, why it is held and the other parties to whom it may be passed on.

### **2 Scope**

- 2.1 Personal information or data is defined as data which relates to a living individual who can be identified from that data, or other information held. This includes any expression of opinion about an individual and intentions towards an individual. It also applies to personal data held visually in photographs or video clips (including CCTV) or as sound recordings.
- 2.2 The Academy Trust collects a large amount of personal data every year including: staff records, names and addresses of those requesting prospectuses, examination marks, references, fee collection as well as the many different types of research data used by the Academy Trust. In addition, it may be required by law to collect and use certain types of information to comply with statutory obligations of government agencies, Local Authorities (LAs) and other bodies.
- 2.3 This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 2018, and other related legislation. It will apply to information regardless of the way it is collected,

used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically.

- 2.4 Compliance with the DP Act is the responsibility of all members of the Academy Trust. Any deliberate breach of the Data Protection Act or this policy may lead to disciplinary action being taken, or even to a criminal prosecution.

### **3 The Eight Principles**

- 3.1 The DP Act lists eight data protection principles, or rules for 'good information handling':

1. Personal data must be processed fairly and lawfully.
2. Personal data shall be obtained only for one or more specific and lawful purposes and shall not be further processed in a manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose(s) for which they are processed.
4. Personal data shall be accurate and where necessary kept up to date.
5. Personal data processed for any purpose(s) shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under the 2018 Data Protection Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country outside the EEA, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

- 3.2 The Academy will comply with the eight principles at all times. This means that the Academy will:

- inform Data Subjects, this could be pupils, parents/carers or staff why they need their personal information, how they will use it and with whom it may be shared. This is known as a Privacy Notice (attached)
- check the quality and accuracy of the information held
- apply the records management policies and procedures to ensure that information is not held longer than is necessary
- ensure that when information is authorised for disposal it is securely destroyed
- ensure appropriate security measures are in place to safeguard personal information whether that is held in paper files or on a computer system
- only share personal information with others when it is necessary and legally appropriate to do so
- set out clear procedures for responding to requests for access to personal information known as subject access in the Data Protection Act
- train all staff so that they are aware of their responsibilities and of the Academy's relevant policies and procedures.

## **4 The Data Controller and the Designated Data Controllers**

- 4.1 The Board of Trustees of the Academy as a corporate body is the Data Controller under the DP Act, and the Board of Trustees are therefore ultimately responsible for compliance with the DP Act. However, the Designated Data Controllers will deal with day to day matters. Each Academy has two Designated Data Controllers: They are the Headteacher and the Finance and Operations Director.
- 4.2 Any member of staff, parent/carer or other individual who considers that the Policy has not been followed in respect of personal data about himself or herself or their child should raise the matter with the appropriate Designated Data Controller, who would be: Mr Liam Knowles.

## **5 Responsibilities**

The Board of Trustees has overall responsibility for compliance with the DP Act.

- 5.1 The Headteacher is responsible for ensuring compliance with DP Act and this policy within the day to day activities of the Academy including appropriate training is provided for all staff.
- 5.2 All staff are responsible for:
- Checking that any information that they provide to the Academy in connection with their employment is accurate and up to date.
  - Informing the Academy Trust of any changes to information that they have provided, e.g. change of address, either at the time of appointment or subsequently. The School cannot be held responsible for any errors unless the staff member has informed the School of such changes.
  - If and when, as part of their responsibilities, staff collect information about other people (e.g. about a pupil's assessment data, opinions about ability, references to other academic institutions, or details of personal circumstances), they must comply with the DP Act.
  - Every member of staff and Trustee involved with the collection, processing and disclosure of personal data must be aware of their duties and responsibilities by adhering to this policy and to comply with the DP Act.

## **6 Adequate, relevant and non-excessive processing**

Your personal data will only be processed to the extent that it is necessary for the specific purposes notified to you.

## **7 Accurate data**

We will keep the personal data we store about you accurate and up to date. Data that is inaccurate or out of date will be destroyed. Please notify us if your personal details change or if you become aware of any inaccuracies in the personal data we hold about you.

## **8 Processing in line with your rights**

You have the right to:

- Request access to any personal data we hold about you.
- Prevent the processing of your data for direct-marketing purposes.
- Ask to have inaccurate data held about you amended.
- Prevent processing that is likely to cause unwarranted substantial damage or distress to you or anyone else.
- Object to any decision that significantly affects you being taken solely by a computer or other automated process.

## **9 Data Security**

- We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.
- We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We will only transfer personal data to a third party if they agree to comply with those procedures and policies, or if they put in place adequate measures themselves.
- Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data.

## **10 Providing information to third parties**

We will not disclose your personal data to a third party without your consent unless we are satisfied that they are legally entitled to the data. Where we do disclose your personal data to a third party, we will have regard to the eight data protection principles.

## **11 Subject access requests**

- 11.1 If you wish to know what personal data we hold about you, you must make the request in writing. All such written requests should be forwarded to the Finance and Operations Director.
- 11.2 The Academy Trust aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days, as required by the DP Act.
- 11.3 As a general guide, a child of 12 or older is expected to be mature enough to make this kind of request.

## **12 Accessing pupils' information**

- 12.1 Pupils attending any type of school have a right of access under the DPA to their own information. This is known as the right of subject access. When a child cannot act for themselves or the child gives permission, parents will be able to access this information on their behalf.
- 12.2 If the child attends a maintained school, parents have an independent right of access to their child's educational record, under separate education regulations. A request for an educational record must receive a response within 15 school days.

## **13 Consent**

- 13.1 In many cases, the Academy Trust can only process personal data with the consent of the individual.
- 13.2 In some cases, if the data is sensitive, as defined in the DP Act, express consent must be obtained. Agreement to the Academy Trust processing some specified classes of personal data is a condition of acceptance of employment for staff. This includes information about previous criminal convictions.
- 13.3 The Academy Trust has a duty of care to all staff and students and must therefore make sure that employees and those who use Academy Trust facilities do not pose a threat or danger to other users. The Academy Trust may also ask for information about particular health needs, such as allergies to particular forms of medication, or any medical condition such as asthma or diabetes. The Academy Trust will only use this information in the protection of the health and safety of the individual, but will need consent to process this data in the event of a medical emergency, for example.

## **14 Processing Sensitive Information**

- 14.1 Sometimes it is necessary to process information about a person's health, criminal convictions, or race. This may be to ensure that the Academy Trust is a safe place for everyone. Because this information is considered sensitive under the DP Act, staff (and pupils where appropriate) will be asked to give their explicit consent for the Academy Trust to process this data. An offer of employment may be withdrawn if an individual refuses to consent to this without good reason.

## **15 Examples of Personal Data**

- 15.1 Definitions of personal data are highly complex, and it is difficult to define categorically. However, broadly speaking and in day-to-day use, 'personal data' is information which relates to a living, identifiable individual.
- 15.2 In the context of this policy and the Academy Trust's requirement to process 'personal data' as part of its duty of care and to educate its pupils, 'personal data' may include:
- school admission and attendance registers;
  - pupil's curricular records;

- reports to parents on the achievements of their children;
- records in connection with pupils entered for prescribed public examinations;
- staff records, including payroll records;
- pupil behaviour records;
- personal information for teaching purposes;
- records of contractors and suppliers.

15.3 If it is necessary for the Academy Trust to process certain personal data to fulfil its obligations to pupils and their parents or guardians, then consent is not required. However, any information which falls under the definition of personal data, and is not otherwise exempt (see below), will remain confidential. Data will only be disclosed to third parties with the consent of the appropriate individual or under the terms of this policy.

15.4 Sensitive data' may include:

- ethnic or racial origin
- political opinions
- religious beliefs
- other beliefs of a similar nature
- membership of a trade union
- physical or mental health or condition
- offence or alleged offence
- proceedings or court sentence

15.5 Where sensitive personal data is processed by the Academy Trust, the explicit consent in writing of the appropriate individual will be obtained.

## **16 Exemptions**

16.1 There are a number of exemptions contained in the DP Act. These may apply to the right of subject access or to the duty to comply with one or all of the principles. Examples of exemptions include:

- crime and taxation
- parliamentary privilege
- research, history and statistics
- confidential references
- legal professional privilege

16.2 There are other exemptions under the DP Act and would advise you seek legal advice when applying these.

## **17 Breach of Data Protection**

If a breach occurs for example post sent to wrong address with pupil personal information, the Academy Trust must deal with a breach effectively. The breach may arise from a theft, a deliberate attack on systems, from the unauthorised use of personal data by a member of staff, or from accidental loss or equipment



failure. However, the breach occurs the Academy Trust will respond to and manage the incident appropriately.

## **18 Assessing the risks**

The Academy Trust should assess any risks associated with the breach, as these are likely to affect the action taken once the breach has been contained. In particular, the Academy Trust will assess the adverse consequences for individuals; how serious or substantial these are; and how likely they are to happen.

## **19 Notification of breaches**

19.1 Informing people about an information security breach can be an important part of managing the incident, but it is not an end in itself.

19.2 The Academy Trust should be clear about who needs to be notified and why. We should, for example, consider notifying the individuals concerned; the ICO; other regulatory bodies; other third parties such as the police and the banks; or the media.

## **20 Evaluation and response**

It is important that the Academy Trust investigates the causes of the breach and records all actions taken. Also evaluate the effectiveness of our response to it. If necessary, policies and procedures should be updated accordingly.

## **21 Academy Data**

The Academy Trust is required to retain staff and student personal data for a specified period of time following their departure from an Academy within the Trust. Different categories of data will be retained for different periods of time. The relevant retention periods are available on request from the Academy Trust.

## **22 Relationship with FOIA**

Requests for access to personal data that are made by someone who is not the subject of that personal data are not subject access requests. These should be considered under the Freedom of Information Act 2000, but the personal information will not be disclosed if doing so will breach one of the data protection principles.

## **23 Feedback and Complaints**

We welcome any comments or suggestions you may have about the policy. If you want to make any comments about this policy or if you require further assistance or wish to make a complaint then initially this should be addressed to the Headteacher of the relevant Academy within the Trust.

## **24 Information Commissioner's Office**

24.1 If you are not satisfied with the assistance that you get or if we have not been able to resolve your complaint and you feel that a formal complaint needs to be made, then this should be addressed to the Information Commissioner's Office. This is the independent official body that ensures compliance with the Data Protection Act 2018, Freedom of Information Act 2000 and Environmental Information Regulation and that deals with formal complaints. They can be contacted at:

Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

24.2 For your complaint to be eligible for further consideration they will usually need you to provide them with supporting information or evidence. If you are still unsure what supporting evidence you will need to send to them, are not able to provide the information they need, or are unable to complete a form, please contact their Helpline on 0303 123 1113. Call us between 9am and 5pm Monday to Friday.

Telephone: (From the UK) 0303 123 1113 or 01625 545745

E-mail: First Contact team at [casework@ico.gsi.gov.uk](mailto:casework@ico.gsi.gov.uk)

Website: <https://www.ico.gov.uk>

## **25 About Data Retention**

25.1 The corporate information, records and data of Leading Learners Multi Academy Trust is important to how we conduct business and manage employees.

25.2 There are legal and regulatory requirements for us to retain certain data, usually for a specified amount of time. We also retain data to help our business operate and to have information available when we need it. However, we do not need to retain all data indefinitely, and retaining data can expose us to risk as well as be a cost to our business.

25.3 This Policy explains our requirements to retain data and to dispose of data and provides guidance on appropriate data handling and disposal.

25.4 Failure to comply with this policy can expose us to fines and penalties, adverse publicity, difficulties in providing evidence when we need it and in running our business.

25.5 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **26 Scope of Data Retention**

26.1 This policy covers all data that we hold or have control over. This includes physical data such as hard copy documents, contracts, notebooks, letters and invoices. It also includes electronic data such as emails, electronic documents, audio and video recordings and CCTV recordings. It applies to both personal data and non-personal data. In this policy we refer to this information and these records collectively as "data".

26.2 This policy covers data that is held by third parties on our behalf, for example cloud storage providers or offsite records storage. It also covers data that

belongs to us but is held by employees on personal devices in accordance with our ICT and communications policy.

26.3 This policy explains the differences between our formal or official records, disposable information, confidential information belonging to others, personal data and non-personal data. It also gives guidance on how we classify our data.

## 27 Guiding Principles

27.1 Through this policy, and our data retention practices, we aim to meet the following commitments:

- We comply with legal and regulatory requirements to retain data.
- We comply with our data protection obligations, in particular to keep personal data no longer than is necessary for the purposes for which it is processed (storage limitation principle).
- We handle, store and dispose of data responsibly and securely.
- We create and retain data where we need this to operate our business effectively, but we do not create or retain data without good business reason.
- We allocate appropriate resources, roles and responsibilities to data retention.
- We regularly remind employees of their data retention responsibilities.
- We regularly monitor and audit compliance with this policy and update this policy when required.

## 28 Roles and Responsibilities

28.1 **Responsibility of all employees.** We aim to comply with the laws, rules, and regulations that govern our organisation and with recognised compliance good practices. All employees must comply with this policy, the Record Retention Schedule and any communications suspending data disposal. Failure to do so may subject us, our employees, and contractors to serious civil and/or criminal liability. An employee's failure to comply with this policy may result in disciplinary sanctions, including suspension or dismissal. It is therefore the responsibility of everyone to understand and comply with this policy.

28.2 **Leading Learners Multi Academy Trust** is responsible for identifying the data that we must or should retain and determining, in collaboration with our Legal Team the proper period of retention. It also arranges for the proper storage and retrieval of data, co-ordinating with outside vendors where appropriate. The Trust schools will handle the destruction of their records whose retention period has expired in consultation with the Trust Leadership Team.

28.3 **Leading Learners Multi Academy Trust** along with Senior Leaders will:

- Administer the data management programme;

- Helping all staff implement the data management programme and related best practices;
- Plan, develop and prescribe data disposal policies, systems, standards, and procedures; and
- Provide guidance, training, monitoring and updating in relation to this policy.

28.4 **The Data Protection Officer (DPO)** for Leading Learners Multi Academy Trust is Mr Liam Knowles. He is responsible for advising on and monitoring our compliance with data protection laws which regulate personal data. Our DPO works with our Trust Senior Leaders on the retention requirements for personal data and on monitoring compliance with this policy in relation to personal data.

## 29 Types of Data and Data Classifications

29.1 **Formal or official records.** Certain data is more important to us and is therefore listed in the Record Retention Schedule. This may be because we have a legal requirement to retain it, or because we may need it as evidence of our transactions, or because it is important to the running of our business. Please see paragraph 30.1 below for more information on retention periods for this type of data.

29.2 **Disposable information** consists of data that may be discarded or deleted at the discretion of the user once it has served its temporary useful purpose and/or data that may be safely destroyed because it is not a formal or official record as defined by this policy and the Record Retention Schedule. Examples may include:

- Duplicates of originals that have not been annotated.
- Preliminary drafts of letters, memoranda, reports, worksheets, and informal notes that do not represent significant steps or decisions in the preparation of an official record.
- Books, periodicals, manuals, training binders, and other printed materials obtained from sources outside of Leading Learners Multi Academy Trust and retained primarily for reference purposes.
- Spam and junk mail.

Please see paragraph 30.2 below for more information on how to determine retention periods for this type of data.

29.3 **Personal data.** Both formal or official records and disposable information may contain personal data; that is, data that identifies living individuals. Data protection laws require us to retain personal data for no longer than is necessary for the purposes for which it is processed (principle of storage limitation). See paragraph 30.3 below for more information on this.

29.4 **Confidential information belonging to others.** Any confidential information that an employee may have obtained from a source outside of Leading Learners such as a previous employer, must not, so long as such information remains confidential, be disclosed to or used by us. Unsolicited confidential information

submitted to us should be refused, returned to the sender where possible, and deleted, if received via the internet. Please see our confidentiality policy or other relevant policy.

## 30 Retention Periods

- 30.1 **Formal or official records.** Any data that is part of any of the categories listed in the Record Retention Schedule contained in the Annex to this policy, must be retained for the amount of time indicated in the Record Retention Schedule. A record must not be retained beyond the period indicated in the Record Retention Schedule, unless a valid business reason (or notice to preserve documents for contemplated litigation or other special situation) calls for its continued retention. If you are unsure whether to retain a certain record, contact the Trusts GDPR officer.
- 30.2 **Disposable information.** The Record Retention Schedule will not set out retention periods for disposable information. This type of data should only be retained as long as it is needed for business purposes. Once it no longer has any business purpose or value it should be securely disposed of.
- 30.3 **Personal data.** As explained above, data protection laws require us to retain personal data for no longer than is necessary for the purposes for which it is processed (principle of storage limitation). Where data is listed in the Record Retention Schedule, we have taken into account the principle of storage limitation and balanced this against our requirements to retain the data. Where data is disposable information, you must take into account the principle of storage limitation when deciding whether to retain this data.
- 30.4 **What to do if data is not listed in the Record Retention Schedule.** If data is not listed in the Record Retention Schedule, it is likely that it should be classed as disposable information. However, if you consider that there is an omission in the Record Retention Schedule, or if you are unsure, please contact the Trust GDPR officer.

## 31 Storage, Back-Up and Disposal of Data

- 31.1 **Storage.** Our data must be stored in a safe, secure, and accessible manner. Any documents and financial files that are essential to our business operations during an emergency must be duplicated and/or backed up at least once per week and maintained off site.
- 31.2 **Destruction.** Senior Leaders are responsible for the continuing process of identifying the data that has met its required retention period and supervising its destruction. The destruction of confidential, financial, and employee-related hard copy data must be conducted by shredding if possible. Non-confidential data may be destroyed by recycling. The destruction of electronic data must be coordinated with the help of the ICT provider.
- 31.3 The destruction of data must stop immediately upon notification from the Trusts Senior Leaders or the Trusts Legal Team that preservation of documents for contemplated litigation is required (sometimes referred to as a litigation hold). This is because we may be involved in a legal claim or an official investigation (see next paragraph). Destruction may begin again once the Trusts Senior Leaders or the Trusts Legal Team lift the requirement for preservation.

## 32 Special Circumstances

- 32.1 **Preservation of documents for contemplated litigation and other special situations.** We require all employees to comply fully with our Record Retention Schedule and procedures as provided in this policy. All employees should note the following general exception to any stated destruction schedule: If you believe, or the Trusts Senior Leaders or the Trusts Legal Team advise, that certain records are relevant to current litigation or contemplated litigation (that is, a dispute that could result in litigation), government investigation, audit, or other event, you must preserve and not delete, dispose, destroy, or change those records, including emails and other electronic documents, until the Trusts Senior Leaders or the Trusts Legal Team determines those records are no longer needed. Preserving documents includes suspending any requirements in the Record Retention Schedule and preserving the integrity of the electronic files or other format in which the records are kept.
- 32.2 If you believe this exception may apply, or have any questions regarding whether it may apply, please contact Liam Knowles or Sonia Green.
- 32.3 In addition, you may be asked to suspend any routine data disposal procedures in connection with certain other types of events, such as our merger with another organisation or the replacement of our information technology systems.

## 33 Where to go for Advice and Questions

- 33.1 **Questions about the policy.** Any questions about retention periods relevant or any questions about this policy should be referred to Liam Knowles - [liam.knowles@leadinglearnersmat.co.uk](mailto:liam.knowles@leadinglearnersmat.co.uk) or Sonia Green - [sonia.green@leadinglearnersmat.co.uk](mailto:sonia.green@leadinglearnersmat.co.uk) who are in charge of administering, enforcing, and updating this policy.

## 34 Breach Reporting and Audit

- 34.1 **Reporting policy breaches.** We are committed to enforcing this policy as it applies to all forms of data. The effectiveness of our efforts, however, depend largely on employees. If you feel that you or someone else may have breached this policy, you should report the incident immediately to a Senior Leader. If you are not comfortable bringing the matter up with your immediate supervisor, or do not believe the supervisor has dealt with the matter properly, you should raise the matter with either Liam Knowles - [liam.knowles@leadinglearnersmat.co.uk](mailto:liam.knowles@leadinglearnersmat.co.uk) or Sonia Green - [sonia.green@leadinglearnersmat.co.uk](mailto:sonia.green@leadinglearnersmat.co.uk). If employees do not report inappropriate conduct, we may not become aware of a possible breach of this policy and may not be able to take appropriate corrective action.
- 34.2 No one will be subject to and we do not allow, any form of discipline, reprisal, intimidation, or retaliation for reporting incidents of inappropriate conduct of any kind, pursuing any record destruction claim, or co-operating in related investigations.
- 34.3 **Audits.** We will periodically review this policy and its procedures (including where appropriate by taking outside legal or auditor advice] to ensure we are in compliance with relevant new or amended laws, regulations or guidance.

Additionally, we will regularly monitor compliance with this policy, including by carrying out audits.

### **35 Other Relevant Policies**

35.1 This policy supplements and should be read in conjunction with our other policies and procedures in force from time to time, including without limitation our:

- IT and communications systems policy.
- IT acceptable use policy.
- Confidentiality policy.
- Staff Code of Conduct.

### **36 Monitoring**

Staff and Trustees, on a three yearly basis, will review this policy unless circumstances demand an earlier review.

## Annex A: DEFINITIONS

**Data:** all data that we hold or have control over and therefore to which this policy applies. This includes physical data such as hard copy documents, contracts, notebooks, letters and invoices. It also includes electronic data such as emails, electronic documents, audio and video recordings and CCTV recordings. It applies to both personal data and non-personal data. In this policy we refer to this information and these records collectively as "data".

**Data Protection Officer:** our Data Protection Officer who is responsible for advising on and monitoring compliance with data protection laws.

**Disposable information:** disposable information consists of data that may be discarded or deleted at the discretion of the user once it has served its temporary useful purpose and/or data that may be safely destroyed because it is not a formal or official record as defined by this policy and the Record Retention Schedule.

**Formal or official record:** certain data is more important to us and is therefore listed in the Record Retention Schedule. This may be because we have a legal requirement to retain it, or because we may need it as evidence of our transactions, or because it is important to the running of our business. We refer to this as formal or official records or data.

**Non-personal data:** data which does not identify living individuals, either because it is not about living individuals (for example financial records) or because it has been fully anonymised.

**Personal data:** any information identifying a living individual or information relating to a living individual that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. This includes special categories of personal data such as health data and pseudonymised personal data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.

**Record Retention Schedule:** the schedule attached to this policy which sets out retention periods for our formal or official records.

**Storage limitation principle:** data protection laws require us to retain personal data for no longer than is necessary for the purposes for which it is processed. This is referred to in the GDPR as the principle of storage limitation.



## Annex B: RECORD RETENTION SCHEDULE

Leading Learners Multi Academy Trust establishes retention or destruction schedules or procedures for specific categories of data. This is done to ensure legal compliance (for example with our data protection obligations) and accomplish other objectives, such as protecting intellectual property and controlling costs.

Employees should comply with the retention periods listed in the record retention schedule below, in accordance with the Leading Learners Retention Policy.

If you hold data not listed below or If you become aware of any changes that may affect the periods listed below or if you have any other questions about this record retention schedule, please contact either Liam Knowles (Director of Finance and Operations) or Sonia Green (Head of Finance and Operations).

### School Records Retention Schedule

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
<b>1.0</b>	<b>Governance</b>					
1.1	Instruments of government, including Articles of Association	No		Permanent	<b>Permanent</b>	
1.2	Records for all full governing body, Trustee Meetings, committee, audit and panel meetings, including:  a) agendas b) any report, statutory policy (including Admissions Policy) or other paper considered at governing body/Trustees meetings c) signed minutes	Yes*	School Governance (England) Regulations (2013)	Permanent	<b>Permanent</b>	*If meeting deals with confidential staff issues

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
					from electronic systems	
1.3	Governors/Trustees application forms - successful candidates	Yes		End of term of office + 1 year	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
1.4	Governors/Trustees application forms - unsuccessful candidates	Yes		Date of election + 6 months	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
1.5	Governor/Trustees election voting forms	Yes		Date of election + 6 months	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
1.6	Governors/Trustees - registers and declarations of pecuniary interests	Yes		Current year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
1.7	Trusts and endowments managed by the Trustees	No		Permanent	<b>Permanent</b> Retain in school whilst operationally required, then transfer to HALS	
1.8	Action plans created and / or administered by the governing body/Trustees	No		Life of action plan + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems*	
1.9	Records relating to complaints dealt with by the governing body/Trustees	Yes		Date of resolution of complaint + 7 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems*	*It may be appropriate to review for further retention in the case of contentious disputes

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
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2.0	Management and Administration					
2.1	Log books of activity in the school, maintained by teachers	Yes <sup>1</sup>		Permanent	<b>Permanent</b>	
2.2	School official diary	Yes <sup>1</sup>		Current academic year + 3 years	<b>Destroy</b> Delete securely or destroy as confidential waste	
2.3	Minutes of the senior management team and other internal administrative bodies	Yes <sup>1</sup>		Permanent	<b>Permanent</b>	
2.4	Reports made by the headteacher, Leadership team, teachers or management team	Yes <sup>1</sup>		Retain in school for date of report + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
2.5	Correspondence and general filing created by headteachers, deputy headteachers and other members of staff with administrative responsibilities	Yes <sup>1</sup>		Closure of file + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
2.6	Professional development plans	Yes		Closure of file + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
2.7	School development plans	No		Retain in school for closure of file + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
2.8	Employers' liability certificate	No		Permanent while school is operational	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems once school closes	
2.9	School brochure/prospectus	No		Retain in school for current academic year + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
2.10	Circulars to staff and pupils	No		Current academic year + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
2.11	Newsletters to parents	No		Retain in school for current academic year + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
2.12	Visitors' books, signing in systems	Yes		Current academic year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
2.13	PTA (Parent Teacher Association) / old pupils' associations records	Yes		Retain in school for current academic year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

<sup>1</sup> Since 1 January 2005 subject access has been permitted into unstructured filing systems, including log books and other records created within the school, containing details about the activities of individual pupils. As such members of staff are subject to the Data Protection Act 1998.

3.0	LA (Local Authority) Data/Information					
3.1	Secondary transfer sheets (primary)	Yes		Current academic year + 2 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
3.2	Attendance returns	Yes		Current academic year + 1 year	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
3.3	Circulars from the LA	No		Whilst operationally required	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
<b>4.0</b>	<b>DfE (Department for Education)</b>					
4.1	HMI reports	No		Permanent	<b>Permanent</b>	These are no longer produced
4.2	OFSTED reports	No		Retain in school while current; replace former report with any new inspection report	<b>Permanent</b>	
4.3	OFSTED-related papers	No		Current year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
4.4	Returns to the DfE	No		Current year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
4.5	Circulars from the DfE	No		Whilst operationally required	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
4.6	School census returns	Yes	Education (School Performance Information) (England) Regulations 2007	Current year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
<b>5.0</b>	<b>Pupils</b>					
5.1	Records relating to the creation and implementation of the school's Admissions Policy	No	School Admissions Code (2014)	Retain in school for life of the policy + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
5.2	Admission forms: unsuccessful or withdrawn applications (including supplementary information e.g. proof of address, religion, medical conditions etc.)	Yes	School Admissions Code (2014)	a) If no appeal, 1 year from receipt b) If appealed, 1 year from resolution of case*	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	*Records relating to appeals retained by Appeals Panel for 22 years from date of birth of pupil
5.3	Admission forms: successful applications	Yes	School Admissions Code (2014)	Date of admission + 1 year	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	Ensure that supplementary information e.g. proof of address, religion, medical conditions is added to the pupil's file
5.4	Admission registers	Yes	Education (Pupil Registration) (England) Regulations 2006	Retain in school until date of last entry in the book (or file) + 3 years	<b>Permanent</b> Transfer to HALS	If held electronically, a printout should be made at least <b>annually</b> . Any corrections made to electronic data should be clearly shown in the printout.
5.5	Attendance registers	Yes	Education (Pupil Registration) (England) Regulations 2006	Date of register + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.6	Pupil absence letters / leave forms / correspondence relating to authorised absence	Yes		Date of absence + 2 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
5.7	Absence books	Yes		Current year + 6 years from last entry in book	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
5.8	Telephone message books for recording absences (sickness) or changes to pick up arrangements, etc.	Yes		Current year + 6 years from last entry in book	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
5.9	Child protection files <ul style="list-style-type: none"> <li>• <b>Primary</b></li> </ul>	Yes	DfE 'Keeping Children Safe in Education' (2016), Annex B, p.61	Retain while the pupil remains at the primary school*	Follow guidelines in 5.13 for pupils transferring to another school	*CP information must be kept separate from the main pupil file.  Where children leave the school or college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit. Confirmation of receipt should be obtained.



No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.10	Child protection files <ul style="list-style-type: none"> <li>• <b>Secondary</b></li> </ul>	Yes	DfE 'Keeping Children Safe in Education' (2016), Annex B, p.61	Date of birth of pupil + 25 years*	<b>Destroy or as below</b> If the child leaves the school: follow guidelines in 5.13 for pupils transferring to another school  If the retention period is reached: destroy as confidential waste or delete securely from electronic systems	*CP information must be kept separate from the main pupil file.  Both the educational record and CP information must be retained for 25 years from DOB.  Where children leave the school or college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit. Confirmation of receipt should be obtained.
5.11	Pupil's educational record (pupil file)  <b>Pupils with Special Educational Needs (SEN)</b> <ul style="list-style-type: none"> <li>• <b>Primary</b></li> </ul>	Yes	Retain while pupil remains at the primary school	Retain while the pupil remains at the primary school*	Follow guidelines in 5.13 for pupils transferring to another school	Includes: <ul style="list-style-type: none"> <li>• SEN reviews</li> <li>• Individual Education Plans (IEPs) / pupil profiles</li> <li>• Health questionnaires</li> <li>• Parental consent forms</li> <li>• Health care plans</li> <li>• Records of medicine administered</li> </ul>

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.12	Pupil's educational record (pupil file)  <b>Pupils with Special Educational Needs (SEN)</b> <ul style="list-style-type: none"> <li>• <b>Secondary</b></li> </ul>	Yes		Date of birth of pupil + 22 years*	<b>Destroy or as below</b> If the child leaves the school: follow guidelines in 5.13 for pupils transferring to another school  If the retention period is reached: destroy as confidential waste or delete securely from electronic systems	*Unless child protection applies, in which case retain for 25 years from DOB; see 5.10.  Includes: <ul style="list-style-type: none"> <li>• SEN reviews</li> <li>• Individual Education Plans (IEPs) / pupil profiles</li> <li>• Health questionnaires</li> <li>• Parental consent forms</li> <li>• Health care plans</li> <li>• Records of medicine administered</li> <li>• Work experience agreements</li> </ul>
5.13	Pupil's educational record (pupil file)  <b>All other pupils</b> <ul style="list-style-type: none"> <li>• <b>Primary</b></li> </ul>	Yes	The Education (Pupil Information) (England) Regulations 2005	Retain while the pupil remains at the primary school, then:  a) Pupil transfers to a known Local Authority primary or secondary school in same area	<b>The file should follow the pupil when he/she leaves primary school:</b>  a) Send pupil record to new school	Includes: <ul style="list-style-type: none"> <li>• Health questionnaires</li> <li>• Parental consent forms</li> <li>• Health care plans</li> <li>• Records of medicine administered</li> </ul>

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
				<ul style="list-style-type: none"> <li>b) Pupil transfers to a known Local Authority or independent primary / secondary school which is another county within the UK; or transfers to an independent school within the Local Authority</li> <li>c) Pupil transfers to a known primary / secondary school outside of the UK</li> <li>d) Pupil transfers to an unknown school</li> </ul>	<ul style="list-style-type: none"> <li>b) Send pupil record to new school, retaining a copy or summary until pupil is 22 years old, then destroy confidentially or delete securely</li> <li>c) Send a copy of pupil record to new school, retaining original pupil record until pupil is 22 years old, then destroy confidentially or delete securely</li> <li>d) Retain pupil file until pupil is 22 years old, then destroy confidentially or delete securely</li> </ul>	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.14	Pupil's educational record (pupil file)  <b>All other pupils</b> <ul style="list-style-type: none"> <li>• <b>Secondary</b></li> </ul>	Yes	Limitation Act (1980)	Date of birth of pupil + 22 years*	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	*Unless child protection applies, in which case retain for 25 years from DOB; see 5.10.  Includes: <ul style="list-style-type: none"> <li>• Health questionnaires</li> <li>• Parental consent forms</li> <li>• Health care plans</li> <li>• Records of medicine administered</li> <li>• Work experience agreements</li> </ul>
5.15	Pupil's educational record (pupil file) <ul style="list-style-type: none"> <li>• Deceased pupils</li> </ul>	Yes		Date of death + 7 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
5.16	Images of pupils - signed consent forms by parent / guardian	Yes		Date of signing + 5 years; or at end of project; or when pupil leaves the school	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	Images should not be reused outside of the time period or for other projects other than that specified on the form
5.17	Activity / visit / trip consent forms - signed by parent or guardian where no incident occurs	Yes		Date of event + 1 year	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.18	Activity / visit / trip consent forms - signed by parent or guardian where a major incident occurs	Yes	Limitation Act 1980	Date of birth of child involved in incident + 22 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	<b>Important:</b> consent forms for ALL pupils for an event where a major incident occurs must be retained, not just that of the child involved
5.19	Behaviour Logs	Yes		Retain while the pupil remains at the primary school	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
5.20	SATS papers (completed)	Yes	Department for Education (DfE) recommendation	Current year + 1 year	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
5.21	SATS results for individual pupils	Yes			Add to the main pupil file and follow retention period for 5.14	
5.22	Internal and external examination papers (completed)	Yes		Current academic year + 6 years or until any appeals / validation process is complete	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
5.23	Internal and external examination results for individual pupils	Yes			Add to the main pupil file and follow retention period for 5.14*	*Uncollected GCSE and A Level certificates should be returned to the relevant examination board
5.24	Examination results - summaries or other statistical information created by the school	Yes		Current academic year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.25	Any other records created in the course of contact with pupils maintained for teachers' own use (i.e. NOT part of the educational record)	Yes		Current academic year + 3 years	<b>Review</b> Review by school and EITHER allocate further retention period OR destroy as confidential waste or delete securely from electronic systems	
5.26	Annual parents' meetings	Yes		Permanent	<b>Permanent</b>	

6.0	Curriculum					
6.1	Curricula records	No		Whilst operationally required	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	May include: <ul style="list-style-type: none"> <li>• curriculum development records</li> <li>• lesson plans</li> <li>• syllabuses</li> <li>• schemes of work</li> <li>• timetables</li> <li>• mark books</li> <li>• records of homework set</li> </ul>

7.0	Human Resources					
7.1	Interview notes and recruitment records (including pre-employment vetting information) <ul style="list-style-type: none"> <li>unsuccessful candidates</li> </ul>	Yes		Date of interview + 1 year	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	Includes: <ul style="list-style-type: none"> <li>proof of identity</li> <li>proof of right to work in the UK</li> </ul>
7.2	Interview notes and recruitment records (including pre-employment vetting information) <ul style="list-style-type: none"> <li>successful candidates</li> </ul>	Yes		Follow retention period for 7.4	All recruitment information to be added to staff personnel file, except DBS checks (for DBS see 7.3)	
7.3	Pre-employment vetting information <ul style="list-style-type: none"> <li>successful candidates' DBS checks*</li> </ul>	Yes	DfE 'Keeping Children Safe in Education' guidance (regularly updated)	Maximum of date of check + 6 months	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems by the designated member of staff	*Formerly CRB checks  Schools are not required to retain copies of DBS certificates. If the school chooses to do so, the copy must NOT be retained for longer than 6 months
7.4	Staff files (main personnel file)	Yes	Limitation Act (1980)	End of employment + 7 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
7.5	Staff annual appraisal / assessment records	Yes		Current appraisal year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
7.6	Staff timesheets	Yes	Financial regulations	Current academic year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	May be held on SAP
7.7	Staff sickness records, excluding ill-health referrals (self-certification, doctor's certificates)	Yes		Current academic year + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
7.8	Staff sickness records <ul style="list-style-type: none"> <li>ill health referrals</li> </ul>	Yes	Limitation Act (1980)		Add to main personnel file and follow retention period for 7.4	
7.9	Staff maternity and paternity pay records	Yes	Statutory Maternity Pay Regulations (1986) (as amended)	Current academic year + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
7.10	Disciplinary proceedings* <ul style="list-style-type: none"> <li>warnings</li> </ul>	Yes			Add to main personnel file and follow retention period for 7.4	*for child protection / safeguarding disciplinary proceedings, see 7.13
7.11	Disciplinary proceedings* <ul style="list-style-type: none"> <li>substantiated or unsubstantiated</li> </ul>	Yes		a) outcome letter: end of employment + 7 years b) all other records: close of case + 7 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	*for child protection / safeguarding disciplinary proceedings, see 7.13



No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
7.12	Disciplinary proceedings* <ul style="list-style-type: none"> <li>false or malicious</li> </ul>	Yes		a) outcome letter: end of employment + 7 years b) all other records: shred at close of case	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	*for child protection / safeguarding disciplinary proceedings, see 7.13
7.13	Disciplinary proceedings* <ul style="list-style-type: none"> <li>safeguarding / child protection related</li> </ul>	Yes	DfE 'Keeping Children Safe in Education' guidance (regularly updated)	Until normal pension age, or for 10 years from date of allegation, whichever is longer	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	*including where the allegation is unsubstantiated
7.14	Records of industrial tribunals, disciplinary panels, appeals	Yes	Limitation Act 1980 can apply		a) outcome letter: add to personnel file and follow retention period for 7.4 b) all other records: shred 7 years from end of process	
7.15	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		End of employment + 7 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
<b>8.0</b>	<b>Health and Safety (H&amp;S)</b>					
8.1	Health and safety policies	No		Life of policy + 7 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
8.2	Risk assessments: general	No	Limitation Act (1980)	Date of risk assessment + 7 years (update regularly)	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
8.3	Risk assessments: exposure to noise, vibration, lead, asbestos, chemicals and biohazards (including COSHH)	No	Control of Substances Hazardous to Health Regulations (2002), Regulation 11  Control of Asbestos at Work Regulations (2012), Regulation 19	Date of risk assessment + 40 years (update regularly)	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
8.4	Risk assessments: exposure to radiation	No	Ionising Radiation Regulations 1999 (SI 1999/3232)	Date of risk assessment + 50 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
8.5	Accident reporting: adults a) accident books b) Reportable injury forms c) Accident investigation records	Yes	Social Security (Claims and Payments) Regulations (1979), Regulation 25  Social Security Administration Act (1992), Section 8.  Limitation Act (1980)	(a) Current year + 3 (b) Current year + 3 (c) Current year + 3	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	Since April 2016 accident reporting has been completed online and all copies are held electronically

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
8.6	Accident reporting: children a) accident books b) Reportable injury forms c) Accident investigation records	Yes	Social Security (Claims and Payments) Regulations (1979), Regulation 25  Social Security Administration Act (1992), Section 8.  Limitation Act (1980)	(a) Keep books until youngest child entered has reached age 22 (b) Date of birth of child + 22 years (c) Date of birth of child + 22 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	Since April 2016 accident reporting has been completed online and all copies are held electronically
8.7	Violent incident reporting (VIR)	Yes	Limitation Act (1980)	Current year + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
8.8	Physical intervention forms	Yes		Date of birth of child + 22 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
8.9	Fire precaution log books (e.g. records of drills and tests)	No	Limitation Act (1980)	Current year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
8.10	Accessibility plans	Yes	Equalities Act (2010)	Current year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
8.11	Health and safety training records	Yes		While current + 6 years, unless records apply for limited period (e.g. First Aid Certificates)	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
8.12	Maintenance records for any work equipment, including ladders, trollies, PPE, PAT etc.	No		Current year + 10 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
8.13	Health and safety inspection records, including: <ul style="list-style-type: none"> <li>• site inspections</li> <li>• playground inspections</li> </ul>	No		Current year + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
<b>9.0</b>	<b>Finance</b>					
9.1	Annual accounts	No		Retain in school for current year + 6 years	<b>Transfer to archive</b> Offer to HALS to review for historic interest	
9.2	Annual budget and background papers	No		Current year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
9.3	Budget reports and budget monitoring records	No		Current year + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
9.4	<p>Records covered by various financial regulations</p> <p>Including: invoices, receipts, order books, requisitions, delivery notices, petty cash records, records relating to the collection and banking of monies, records relating to the identification and collection of debt</p>	No	Financial regulations	Current financial year + 6 years	<p><b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems</p>	
9.5	Copy orders	No		Current year + 2 years, or current year + 6 years if included with delivery notes, invoices and receipts, etc.	<p><b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems</p>	
9.6	Loans and grants managed by the school	No	Financial regulations	Date of last payment on loan + 12 years	<p><b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems</p>	
9.7	<p>School Fund records</p> <p>Including: cheque books, paying-in books, ledgers, invoices, receipts, bank statements, journey books</p>	No	Financial regulations	Current financial year + 6 years	<p><b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems</p>	
9.8	Contracts: under seal		Limitation Act (1980)	Contract completion date + 13 years	<p><b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems</p>	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
9.9	Contracts: under signature		Limitation Act (1980)	Contract completion date + 7 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
9.10	Contracts: monitoring records			Current year + 2 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
9.11	Free school meals records	Yes	Financial regulations	Current year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
9.12	School meals registers	Yes		Current year + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
9.13	School meals summary sheets	No		Current year + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
9.14	Applications for free school meals, travel, uniforms etc.	Yes	Financial regulations	Whilst child at school or current year + 6 years, whichever is the longest	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
9.15	Payroll records where school administers own payroll	Yes	Financial regulations	Current year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
9.16	Records relating to individuals' pension details	Yes	Financial regulations	End of employment + 7 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
<b>10.0</b>	<b>Property</b>					
10.1	Title deeds of all properties belonging to the school	No		Permanent	<b>Permanent</b>	
10.2	Plans of all properties belonging to the school	No		Permanent	<b>Permanent</b>	
10.3	Leases of properties leased by or to the schools	No		Expiry of lease + 7 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
10.4	Records relating to the letting of school premises	No		Current year + 3 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
10.5	Burglary, theft and vandalism report forms			Current year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
10.6	All records relating to the maintenance of the school, including maintenance log books	No		Current year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
10.7	Inventories of equipment and furniture			Current year + 6 years	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	
10.8	Insurance papers			While current	<b>Destroy</b> Destroy as confidential waste or delete securely from electronic systems	

11.0	Miscellaneous					
11.1	Photo albums			While useful	<b>Transfer to archive</b>	
11.2	Audio and video recordings			While useful	<b>Transfer to archive</b>	