



The Athelstan Trust

Data Protection – Data Retention Policy

| Date of Review | Approved by | Date of Approval | Next Review Date | Website |
|--|-------------|------------------|------------------|---------|
| May 2021, July 2022, November 2023, Nov 25 | Executive | November 2025 | December 2027 | Y |

1. Introduction

The Athelstan Trust issues this policy to meet the requirements incumbent upon them under The GDPR and the Data Protection Act 2018 for the handling of personal data in its role as a data controller.

2. Scope

This policy applies to all employees of The Athelstan Trust including contract, agency and temporary staff, volunteers and employees of partner organisations working for the Trust.

3. Retention

In line with the GDPR and the Data Protection Act 2018, the organisation will keep some forms of information for longer than others. Information will not be kept indefinitely, unless there are specific requirements.

[Appendix 2](#), gives a detailed breakdown of timescales for the retention of various types of information. This schedule has been taken from the Information and Records Management Society's Toolkit for Schools (2019).

4. Disposal

When data is no longer required it should be appropriately destroyed. A log will be maintained summarising the information which has been disposed of.

The organisation will either use an accredited confidential waste disposal provider, or it will shred the information using a cross-cut shredder. Information on what should be deemed as confidential waste is detailed in [Appendix 1](#).

5. Monitoring and compliance

Compliance with this policy shall be monitored through a review process. This will be agreed with the Data Protection Officer, and compliance will be reported to the senior management board.

Should it be found that this policy has not been complied with, or if an intentional breach of the policy has taken place, the organisation, in consultation with senior management, shall have full authority to take the immediate steps considered necessary, including disciplinary action.

Review this Policy upon;

Change of Data Protection Officer.

Change of Legislation.



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Appendix 1 - What is Confidential Waste?

(1) Any record* which details personal information

What is personal information?

- Relates to and identifies a living person
- Could help someone identify a person when used with other information
- Is an expression of opinion about an individual
- Indicates our intentions towards an individual

Such as: Name, Address, Date of Birth, Email, Phone numbers, Location data, IP addresses

(2) Any record* which details special categories of personal data

What is special categories of personal data?

- Racial and/or Ethnic Origin
- Political Opinions
- Religious Beliefs (or other beliefs of a similar nature)
- Trade Union membership
- Biometric Information e.g. Photos
- Mental or Physical Health condition
- Sexual life and Orientation
- Criminal Records (actual or suspected)

Such as: Safeguarding, Accident/First Aid, Equalities information, Legal records

(3) Any record* which details business/commercially sensitive information

What is business/commercially sensitive information?

- Information which The Athelstan Trust would be affected by any loss of, or unauthorised access to.

Such as: Contracts, opinions on service delivery, tender information.

If you have any doubt then please treat the information as Confidential

** A Record can be in many formats – e.g. Paper, Post-it notes, Disks, CDs, Tapes, Posters etc.*



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Appendix 2 - Retention Guidelines

1 Governing Body

This section contains retention periods connected to the work and responsibilities of the governing body.

| 1.1 Management of Governing Body | | | | | |
|----------------------------------|---|----------------------|---|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 1.1.1 | Instruments of government | | For the life of the school | Consult local archives before disposal | |
| 1.1.2 | Trusts and endowments | | For the life of the school | Consult local archives before disposal | |
| 1.1.3 | Records relating to the election of parent and staff governors not appointed by the governors | | Date of election + 6 months | SECURE DISPOSAL | Yes |
| 1.1.4 | Records relating to the appointment of co-opted governors | | Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children). In this case retain for 25 years | SECURE DISPOSAL | Yes |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|-------|--|----------------------|--|--|----------------------|
| 1.1.5 | Records relating to the election of chair and vice chair | | Once the decision has been recorded in the minutes, the records relating to the election can be destroyed | SECURE DISPOSAL | Yes |
| 1.1.6 | Scheme of delegation and terms of reference for committees | | Until superseded or whilst relevant [Schools may wish to retain these records for reference purposes in case decisions need to be justified] | These could be offered to the archives if appropriate | |
| 1.1.7 | Meetings schedule | | Current year | STANDARD DISPOSAL | |
| 1.1.8 | Agendas - principal copy | | Where possible the agenda should be stored with the principal set of the minutes | Consult local archives before disposal | Potential |
| 1.1.9 | Minutes - principal set (signed) | | Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting | Consult local archives before disposal | Potential |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|--------|---|----------------------|--|--|----------------------|
| 1.1.10 | Reports made to the governors' meeting which are referred to in the minutes | | Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting | Consult local archives before disposal | Potential |
| 1.1.11 | Register of attendance at Full governing board meetings | | Date of last meeting in the book + 6 years | SECURE DISPOSAL | Yes |
| 1.1.12 | Papers relating to the management of the annual parents' meeting | | Date of meeting + 6 years | SECURE DISPOSAL | Yes |
| 1.1.13 | Agendas - additional copies | | Date of meeting | STANDARD DISPOSAL | |
| 1.1.14 | Records relating to Governor Monitoring Visits | | Date of the visit + 3 years | SECURE DISPOSAL | Yes |
| 1.1.15 | Annual Reports required by the DoE | | Date of report + 10 years | SECURE DISPOSAL | |
| 1.1.16 | All records relating to the conversion of schools to Academy status | | For the life of the organisation | Consult local archives before disposal | |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|--------|---|----------------------|---|--|----------------------|
| 1.1.17 | Records relating to complaints made to and investigated by the governing body or head teacher | | Major complaints: current year + 6 years. If negligence involved then: current year + 15 years If child protection or safeguarding issues are involved then: current year + 40 years | SECURE DISPOSAL | Yes |
| 1.1.18 | Correspondence sent and received by the governing body or head teacher | | General correspondence should be retained for current year + 3 years | SECURE DISPOSAL | Potential |
| 1.1.19 | Action plans created and administered by the governing body | | Until superseded or whilst relevant | SECURE DISPOSAL | |
| 1.1.20 | Policy documents created and administered by the governing body | | Until superseded [The school should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the IICSA has issued its recommendations.] | | |



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| 1.2 Governor Management | | | | | |
|-------------------------|---|----------------------|---|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 1.2.1 | Records relating to the appointment of a clerk to the governing body | | Date on which clerk appointment ceases + 6 years | SECURE DISPOSAL | Yes |
| 1.2.2 | Records relating to the terms of office of serving governors, including evidence of appointment | | Date appointment ceases + 6 years | | Yes |
| 1.2.3 | Records relating to governor declaration against disqualification criteria | | Date appointment ceases + 6 years | SECURE DISPOSAL | Yes |
| 1.2.4 | Register of business interests | | Date appointment ceases + 6 years | SECURE DISPOSAL | Yes |
| 1.2.5 | Governors Code of Conduct | | This is expected to be a dynamic document; one copy of each version should be kept for the life of the organisation | | |
| 1.2.6 | Records relating to the training required and received by Governors | | Date Governor steps down + 6 years | SECURE DISPOSAL | Yes |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|-------|---|----------------------|-----------------------------------|--|----------------------|
| 1.2.7 | Records relating to the induction programme for new governors | | Date appointment ceases + 6 years | SECURE DISPOSAL | Yes |
| 1.2.8 | Records relating to DBS checks carried out on clerk and members of the governing body | | Date of DBS check + 6 months | SECURE DISPOSAL | Yes |
| 1.2.9 | Governor personnel files | | Date appointment ceases + 6 years | SECURE DISPOSAL | Yes |

2 Management of the School

This section contains retention periods connected to the processes involved in managing the school, including Human Resources, Financial Management, Payroll and Property Management.

| 2.1 Head Teacher and Senior Management Team | | | | | |
|---|---|----------------------|--|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 2.1.1 | Log books of activity in the school maintained by the Head Teacher | | Date of last entry in the book + minimum of 6 years, then review | These could be of permanent historical value and should be offered to the County Archives Service if appropriate | Potential |
| 2.1.2 | Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies | | Date of the meeting + 3 years then review annually, or as required if not destroyed | SECURE DISPOSAL | Potential |
| 2.1.3 | Reports created by the Head Teacher or the Management Team | | Date of the report + a minimum of 3 years then review annually or as required if not destroyed | SECURE DISPOSAL | Potential |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|-------|--|----------------------|--|--|----------------------|
| 2.1.4 | Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities which do not fall under any other category | | Current academic year + 6 years then review annually, or as required if not destroyed | SECURE DISPOSAL | Potential |
| 2.1.5 | Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities | | Current year + 3 years | SECURE DISPOSAL | Potential |
| 2.1.6 | Professional development plans | | These should be held on the individual's personnel record. If not then termination of employment + 6 years | SECURE DISPOSAL | Potential |
| 2.1.7 | School development plans | | Life of the plan + 3 years | SECURE DISPOSAL | |



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| 2.2 Operational Administration | | | | | |
|--------------------------------|---|----------------------|--|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 2.2.1 | General file series which do not fit under any other category | | Current year + 5 years, then review | SECURE DISPOSAL | Potential |
| 2.2.2 | Records relating to the creation and publication of the school brochure or prospectus | | Current academic year + 3 years | The school could preserve a copy for their archive otherwise STANDARD DISPOSAL | |
| 2.2.3 | Records relating to the creation and distribution of circulars to staff, parents or pupils | | Current academic year + 1 year | STANDARD DISPOSAL | |
| 2.2.4 | School Privacy Notice which is sent to parents as part of GDPR compliance | | Until superseded + 6 years | | |
| 2.2.5 | Consents relating to school activities as part of GDPR compliance (for example, consent to be sent circulars or mailings) | | Consent will last whilst the pupil attends the school, it can therefore be destroyed when the pupil leaves | SECURE DISPOSAL | Yes |
| 2.2.6 | Newsletters and other items with a short operational use | | Current academic year + 1 year [Schools may decide to archive one copy] | STANDARD DISPOSAL | |
| 2.2.7 | Visitor management systems (including electronic systems, visitors books and signing-in sheets) | | Last entry in the visitors book + 6 years (in case of claims by parents or pupils about various actions). | SECURE DISPOSAL | Yes |
| 2.2.8 | Walking bus registers | | Date of register + 6 years | SECURE DISPOSAL | Yes |



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| 2.3 Human Resources | | | | | |
|---------------------|---|--|---|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| Recruitment | | | | | |
| 2.3.1 | All records leading up to the appointment of a headteacher | | Unsuccessful attempts. Date of appointment plus 6 months. Add to personnel file and retain until end of appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years | SECURE DISPOSAL | Yes |
| 2.3.2 | All records leading up to the appointment of a member of staff/governor – unsuccessful candidates | | Date of appointment of successful candidate + 6 months | SECURE DISPOSAL | Yes |
| 2.3.3 | Pre-employment vetting information – DBS Checks – successful candidates | DBS Update Service Employer Guide June 2014; Keeping Children Safe in Education.2018 (Statutory Guidance from DoE) Sections 73, 74 | Application forms, references and other documents – for the duration of the employee's employment + 6 years | SECURE DISPOSAL | Yes |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|-------------------------------------|---|---|---|--|----------------------|
| Recruitment | | | | | |
| 2.3.4 | Forms of proof of identity collected as part of the process of checking “portable” enhanced DBS disclosure | | Where possible this process should be carried out using the on-line system. If it is necessary to take a copy of documentation then it should be retained on the staff personal file. | SECURE DISPOSAL | Yes |
| 2.3.5 | Pre-employment vetting information – Evidence proving the right to work in the United Kingdom – successful candidates | An Employer’s Guide to Right to Work Checks [Home Office, May 2015] | Where possible these documents should be added to the staff personnel file [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of employment + not less than 2 years | SECURE DISPOSAL | Yes |
| Operational Staff Management | | | | | |
| 2.3.6 | Staff personnel file | Limitation Act 1980 (Section 2) | Termination of Employment + 6 years, unless the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete | SECURE DISPOSAL | Yes |
| 2.3.7 | Annual appraisal/assessment records | | Current year + 6 years | SECURE DISPOSAL | Yes |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|-------------------------------------|--|----------------------|---|--|----------------------|
| Operational Staff Management | | | | | |
| 2.3.8 | Sickness absence monitoring | | <p>Sickness records are categorised as sensitive data. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records.</p> <p>It could be argued that where sickness pay is not paid then current year + 3 years is acceptable, whilst if sickness pay is made then it becomes a financial record and current year + 6 years applies. The actual retention may depend on the internal auditors. Most seem to accept current year + 3 years as being acceptable as this gives them, 'benefits' and Inland Revenue have time to investigate if they need to</p> | SECURE DISPOSAL | Yes |
| 2.3.9 | Staff training – where the training leads to continuing professional development | | Length of time required by the professional body | SECURE DISPOSAL | Yes |
| 2.3.10 | Staff training – except where dealing with children, e.g. first aid or health and safety | | This should be retained on the personnel file [see 2.3.1 above] | SECURE DISPOSAL | Yes |



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|---|---|---|--|--|----------------------|
| Operational Staff Management | | | | | |
| 2.3.11 | Staff training – where the training relates to children (e.g. safeguarding or other child related training) | | Date of the training + 40 years [This retention period reflects that the IICSA may wish to see training records as part of an investigation] | SECURE DISPOSAL | Yes |
| Disciplinary and Grievance Processes | | | | | |
| Where schools are in any doubt as to which categories disciplinary records fall under, then HR or legal advice should be sought from the Local Authority. | | | | | |
| 2.3.12 | Records relating to any allegation of a child protection nature against a member of staff | “Keeping children safe in education Statutory guidance for schools and colleges September 2018”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018” | Until the person’s normal retirement age or 10 years from the date of the allegation (whichever is the longer) then REVIEW. 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 UNLESS the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete | SECURE DISPOSAL These records must be shredded | Yes |
| 2.3.13 | Disciplinary proceedings | | | | Yes |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|--|------------------------|----------------------|--------------------------------|--|----------------------|
|--|------------------------|----------------------|--------------------------------|--|----------------------|

Disciplinary and Grievance Processes

Note:

The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period.

Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line, and then defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim.

Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.

| | | | | | |
|--|---------------------------|--|---|--|--|
| | Oral warning | | Date of warning + 6 months | SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file] | |
| | Written warning – level 1 | | Date of warning + 6 months | | |
| | Written warning – level 2 | | Date of warning + 12 months | | |
| | Final warning | | Date of warning + 18 months | | |
| | Case not found | | If the incident is related to child protection then see above, otherwise dispose of at the conclusion of the case | SECURE DISPOSAL | |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|-----------------------------|------------------------|--|--------------------------------|--|----------------------|
| Payroll and Pensions | | | | | |
| 2.3.14 | Absence record | | Current year + 3 years | SECURE DISPOSAL | Yes |
| 2.3.15 | Batches | Taxes Management Act 1970 Income and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.16 | Bonus sheets | Taxes Management Act 1970 Income and Corporation Taxes 1988 | Current year + 3 years | SECURE DISPOSAL | Yes |
| 2.3.17 | Car allowance claims | Taxes Management Act 1970 Income and Corporation Taxes 1988 | Current year + 3 years | SECURE DISPOSAL | Yes |
| 2.3.18 | Car loans | Taxes Management Act 1970 Income and Corporation Taxes 1988 | Completion of loan + 6 years | SECURE DISPOSAL | Yes |
| 2.3.19 | Car mileage output | Taxes Management Act 1970 Income and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.20 | Elements | | Current year + 2 years | SECURE DISPOSAL | Yes |
| 2.3.21 | Income tax form P60 | | Current year + 6 years | SECURE DISPOSAL | Yes |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|-----------------------------|---|--|--------------------------------|--|----------------------|
| Payroll and Pensions | | | | | |
| 2.3.22 | Insurance | Taxes Management Act 1970 Income and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.23 | Maternity payment | | Current year + 3 years | SECURE DISPOSAL | Yes |
| 2.3.24 | Members allowance register | Taxes Management Act 1970 Income and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.25 | National Insurance – schedule of payments | Taxes Management Act 1970 Income and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.26 | Overtime | Taxes Management Act 1970 Income and Corporation Taxes 1988 | Current year + 3 years | SECURE DISPOSAL | Yes |
| 2.3.27 | Part time fee claims | Taxes Management Act 1970 Income and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.28 | Pay packet receipt by employee | | Current year + 2 years | SECURE DISPOSAL | Yes |
| 2.3.29 | Payroll awards | | Current year + 6 years | SECURE DISPOSAL | Yes |



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|-----------------------------|---------------------------------------|---|--------------------------------|--|----------------------|
| Payroll and Pensions | | | | | |
| 2.3.30 | Payroll – gross/net weekly or monthly | Taxes Management Act 1970 and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.31 | Payroll reports | Taxes Management Act 1970 and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.32 | Payslips – copies | Taxes Management Act 1970 Income and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.33 | Pension payroll | Taxes Management Act 1970 Income and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.34 | Personal bank details | If employment ceases then end of employment + 6 years | Until superseded + 3 years | SECURE DISPOSAL | Yes |
| 2.3.35 | Sickness records | | Current year + 3 years | SECURE DISPOSAL | Yes |
| 2.3.36 | Staff returns | | Current year + 3 years | SECURE DISPOSAL | Yes |
| 2.3.37 | Superannuation adjustments | Taxes Management Act 1970 and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|-----------------------------|---------------------------------------|--|--------------------------------|--|----------------------|
| Payroll and Pensions | | | | | |
| | Superannuation reports | Taxes Management Act 1970 Income and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.38 | Tax forms P6/P11/P11D/P35/P45/P46/P48 | The minimum requirement - as stated in Inland Revenue Booklet 490 - is for at least 3 years after the end of the tax year to which they apply. Originals must be retained in paper/ electronic format. It is a corporate decision to retain for current year + 6 years. Employees should retain records for 22 months after current tax year | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.39 | Time sheets/clock cards/flexitime | | Current year + 3 years | SECURE DISPOSAL | Yes |



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| 2.4 Health and Safety | | | | | |
|-----------------------|---|---|---|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 2.4.1 | Health and safety policy statements | | Life of policy + 3 years | SECURE DISPOSAL | |
| 2.4.2 | Health and safety risk assessments | | Life of risk assessment + 3 years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred | SECURE DISPOSAL | |
| 2.4.3 | Accident reporting records relating to individuals who are over 18 years of age at the time of the incident | <p>Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980</p> <p>Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628</p> <p>Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628</p> <p>Social Security Administration Act 1992 Section 8.</p> <p>Social Security (Claims and Payments) Amendment (No 30) Regulations 1993 SI 1993 No 2113</p> <p>Allows the information to be kept electronically</p> | <p>The Accident Book – BI 510 - 3 years after last entry in the book</p> <p>This includes the new format to be used from 1/1/04</p> <p>This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry</p> <p>Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR</p> | SECURE DISPOSAL | Yes |



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2.4 Health and Safety

| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|-------|--|--|---|--|----------------------|
| 2.4.4 | Accident reporting records relating to individuals who are under 18 years of age at the time of the incident | <p>Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980</p> <p>Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628</p> <p>Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628</p> <p>Social Security Administration Act 1992 Section 8.</p> <p>Social Security (Claims and Payments) Amendment (No 30 Regulations 1993 SI 1993 No 2113</p> <p>Allows the information to be kept electronically</p> | <p>The Accident Book – BI 510 - 3 years after last entry in the book</p> <p>This includes the new format to be used from 1/1/04</p> <p>This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry</p> <p>Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR</p> | SECURE DISPOSAL | Yes |
| 2.4.5 | Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For more information see http://www.hse.gov.uk/RIDDOR/ | Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2) | Date of incident + 3 years provided that all records relating to the incident are held on personnel file [see 2.4.2 above] | SECURE DISPOSAL | Yes |



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|-------|--|--|--|--|----------------------|
| 2.4.6 | Control of Substances Hazardous to Health (COSHH) | Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2) | Date of incident + 40 years | SECURE DISPOSAL | |
| 2.4.7 | Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos | Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19 | Last action + 40 years | SECURE DISPOSAL | |
| 2.4.8 | Process of monitoring of areas where employees and persons are likely to have come into contact with radiation. Maintenance records or controls, safety features and PPE ----- Dose assessment and recording | The Ionising Radiation Regulations 2017. SI 2017 No 1075 Regulation 11 As amended by SI 2018 No 390 Personal Protective Equipment (Enforcement) Regulations 2018 | 2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. ----- To keep the records made and maintained (or a copy of these records) until the person to whom the record relates has or would have attained the age of 75 years, but in any event for at least 30 years from when the record was made | SECURE DISPOSAL | |
| 2.4.9 | Fire Precautions log books | | Current year + 3 years | SECURE DISPOSAL | |

2.4 Health and Safety



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|--|--|----------------------|---|---|----------------------|
| 2.4.10 | Health and safety file to show current state of building, including all alterations (wiring, plumbing, building works, etc.), to be passed on in the case of change of ownership | | Pass to new owner on sale or transfer of building | | |
| 2.5 Financial Management | | | | | |
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| Risk Management and Insurance | | | | | |
| 2.5.1 | Employer's Liability Insurance Certificate | | Closure of the school + 40 years [May be kept electronically] | SECURE DISPOSAL To be passed to the Local Authority if the school closes | |
| Asset Management | | | | | |
| 2.5.2 | Inventories of furniture and equipment | | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.3 | Burglary, theft and vandalism report forms | | Current year + 6 years | SECURE DISPOSAL | |
| Accounts and Statements (including budget management) | | | | | |
| 2.5.4 | Annual accounts | | Current year + 6 years | STANDARD DISPOSAL | |
| 2.5.5 | Loans and grants managed by the school | | Date of last payment on the loan + 12 years then review | SECURE DISPOSAL | |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|--|--|----------------------|---|--|----------------------|
| Accounts and Statements (including budget management) | | | | | |
| 2.5.6 | All records relating to the creation and management of budgets, including the annual budget statement and back-ground papers | | Life of the budget + 3 years | SECURE DISPOSAL | |
| 2.5.7 | Invoices, receipts, order books and requisitions, delivery notices | | Current financial year + 6 years | SECURE DISPOSAL | |
| 2.5.8 | Records relating to the collection and banking of monies | | Current financial year + 6 years | SECURE DISPOSAL | |
| 2.5.9 | Records relating to the identification and collection of debt | | Final payment of debt + 6 years | SECURE DISPOSAL | |
| Pupil Finance | | | | | |
| 2.5.10 | Student Grant applications | | Current year + 3 years | SECURE DISPOSAL | Yes |
| 2.5.11 | Pupil Premium Fund records | | Date pupil leaves the provision + 6 years | SECURE DISPOSAL | Yes |
| Contract Management | | | | | |
| 2.5.12 | All records relating to the management of contracts under seal | Limitation Act 1980 | Last payment on the contract + 12 years | SECURE DISPOSAL | |
| 2.5.13 | All records relating to the management of contracts under signature | Limitation Act 1980 | Last payment on the contract + 6 years | SECURE DISPOSAL | |
| 2.5.14 | Records relating to the monitoring of contracts | | Life of contract + 6 or 12 years | SECURE DISPOSAL | |



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| 2.5 Financial Management | | | | | |
|--------------------------|---|----------------------|--------------------------------|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| School Fund | | | | | |
| 2.5.15 | School Fund - Cheque books | | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.16 | School Fund - Paying in books | | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.17 | School Fund – Ledger | | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.18 | School Fund – Invoices | | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.19 | School Fund – Receipts | | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.20 | School Fund - Bank statements | | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.21 | School Fund – Journey Books | | Current year + 6 years | SECURE DISPOSAL | |
| School Meals Management | | | | | |
| 2.5.22 | Free school meals registers (where the register is used as a basis for funding) | | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.5.23 | School meals registers | | Current year + 3 years | SECURE DISPOSAL | Yes |
| 2.5.24 | School meals summary sheets | | Current year + 3 years | SECURE DISPOSAL | Yes |



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| 2.6 Property Management | | | | | |
|-------------------------|--|----------------------|--|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life | Personal Information |
| Property Management | | | | | |
| 2.6.1 | Title deeds of properties belonging to the school | | These should follow the property unless the property has been registered with the Land Registry | | |
| 2.6.2 | Plans of property belonging to the school | | These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10 | | |
| 2.6.3 | Leases of property leased by or to the school | | Expiry of lease + 6 years | SECURE DISPOSAL | |
| 2.6.4 | Records relating to the letting of school premises | | Current financial year + 6 years | SECURE DISPOSAL | |
| Maintenance | | | | | |
| 2.6.5 | All records relating to the maintenance of the school carried out by contractors | | These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10 | SECURE DISPOSAL | |
| 2.6.6 | All records relating to the maintenance of the school carried out by school employees, including maintenance log books | | These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10 | SECURE DISPOSAL | |



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3 Pupil Management

This section contains retention periods connected to the processes involved in managing a pupil's journey through school, including the admissions process

| 3.1 Admissions Process | | | | | |
|------------------------|---|--|--|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 3.1.1 | All records relating to the creation and implementation of the School Admissions Policy | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Life of the policy + 3 years then review | SECURE DISPOSAL | |
| 3.1.2 | Admissions – if the admission is successful | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Date of admission + 1 year | SECURE DISPOSAL | Yes |
| 3.1.3 | Admissions – if the appeal is unsuccessful | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Resolution of case + 1 year | SECURE DISPOSAL | Yes |
| 3.1.4 | Register of Admissions | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made | REVIEW Schools may wish to consider keeping the admission register permanently as an archive record as often schools receive enquiries from past pupils to confirm the dates they attended the school or to transfer these records to the appropriate County Archives Service | |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|---------|---|--|--|--|----------------------|
| 3.1.5 | Admissions – Secondary Schools – Casual | | Current year + 1 year | SECURE DISPOSAL | Yes |
| 3.1.6 | Proofs of address supplied by parents as part of the admissions process | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Current year + 1 year | SECURE DISPOSAL | Yes |
| 3.1.7 | Supplementary information form including additional information such as religion, medical conditions etc. | | | | Yes |
| 3.1.7.1 | For successful admissions | | This information should be added to the pupil file | SECURE DISPOSAL | |
| 3.1.7.2 | For unsuccessful admissions | | Until appeals process completed (GDPR) | SECURE DISPOSAL | |



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3.2 Pupil's Educational Record

| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|---|---|--|---|---|----------------------|
| <p>Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.</p> | | | | | |
| 3.2.1 | Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 | The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 As amended by SI 2018 No 688 | | | Yes |
| 3.2.1.1 | Primary | | Retain whilst the child remains at the primary school | The file should follow the pupil when he/she leaves the primary school. This will include: <ul style="list-style-type: none"> • To another primary school • To a secondary school • To a pupil referral unit | |
| 3.2.1.2 | Secondary | Limitation Act 1980 (Section 2) | Date of birth of the pupil + 25 years | REVIEW | |
| 3.2.2 | Examination Results – pupil copies | | | | Yes |
| 3.2.2.1 | Public | | This information should be added to the pupil file | All uncollected certificates should be returned to the examination board after reasonable attempts to contact the pupil have failed | |
| 3.2.2.2 | Internal | | This information should be added to the pupil file | | |



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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|-------|---|--|--|--|----------------------|
| 3.2.3 | Child protection information held on pupil file | “Keeping children safe in education Statutory guidance for schools and colleges 2018”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018” | 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. Note: These records will be subject to any instruction given by IICSA | SECURE DISPOSAL These records must be shredded | Yes |
| 3.2.4 | Child protection information held in separate files | “Keeping children safe in education Statutory guidance for schools and colleges 2018”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018” | DOB of the child + 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record Note: These records will be subject to any instruction given by IICSA | SECURE DISPOSAL These records must be shredded | Yes |



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3.3 Attendance

| | Basic file description | Statutory Provisions | Retention Period (Operational) | Action at the end of the Administrative life of the record | Personal Information |
|--|------------------------|----------------------|--------------------------------|--|----------------------|
|--|------------------------|----------------------|--------------------------------|--|----------------------|

Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.

| | | | | | |
|-------|---|--|--|-----------------|-----------|
| 3.3.1 | Attendance Registers | School attendance Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014 | Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made. | SECURE DISPOSAL | Yes |
| 3.3.2 | Correspondence relating to any absence (authorised or unauthorised) | Education Act 1996 Section 7 | Current academic year + 2 years | SECURE DISPOSAL | Potential |

3.3 Attendance

| 3.3 | Basic file description | Statutory Provisions | Retention Period (Operational) | Action at the end of the Administrative life of the record | Personal Information |
|-----|------------------------|----------------------|--------------------------------|--|----------------------|
|-----|------------------------|----------------------|--------------------------------|--|----------------------|

Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.



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| | | | | | |
|-------|---|--|---|-----------------|-----|
| 3.4.1 | Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy | Children and Family's Act 2014; Special Educational Needs and Disability Act 2001 Section 14 | Date of birth of the pupil + 31 years [Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan in line with the Limitation Act | SECURE DISPOSAL | Yes |
|-------|---|--|---|-----------------|-----|



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4 Curriculum and Extra Curricular Activities

This section contains retention periods connected to the processes involved in managing the curriculum and extra-curricular activities.

| 4.1 Statistics and Management Information | | | | | |
|---|--|----------------------|---|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 4.1.1 | Curriculum returns | | Current year + 3 years | SECURE DISPOSAL | No |
| 4.1.2 | Examination Results (school's copy) | | Current year + 6 years | SECURE DISPOSAL | Yes |
| 4.1.2.1 | SATS records | | | | Yes |
| 4.1.2.2 | Results | | 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 of the whole year's SATs results. These could be kept for current year + 6 years to allow suitable comparison | SECURE DISPOSAL | |
| 4.1.2.3 | Examination Papers | | The examination papers should be kept until any appeals/validation process is complete | SECURE DISPOSAL | |
| 4.1.3 | Published Admission Number (PAN) Reports | | Current year + 6 years | SECURE DISPOSAL | Yes |



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| 4.1 Statistics and Management Information | | | | | |
|---|---------------------------------|----------------------|---|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 4.1.4 | Value Added and Contextual Data | | Current year + 6 years | SECURE DISPOSAL | Yes |
| 4.1.5 | Self-Evaluation Forms | | | SECURE DISPOSAL | Yes |
| 4.1.5.1 | Internal moderation | | Academic year plus 1 academic year | SECURE DISPOSAL | Yes |
| 4.1.5.2 | External moderation | | Until superseded | SECURE DISPOSAL | Yes |
| 4.2 Implementation of Curriculum | | | | | |
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 4.2.1 | Schemes of work | | Current year + 1 year | It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL | |
| 4.2.2 | Timetable | | Current year + 1 year | | |
| 4.2.3 | Class record books | | Current year + 1 year | | |
| 4.2.4 | Mark books | | Current year + 1 year | | |
| 4.2.5 | Record of home-work set | | Current year + 1 year | | |
| 4.2.6 | Pupil's work | | Where possible, the pupil's 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 | |

For information relating to records concerning the running of educational visits outside the classroom
please see the guidance provided by <https://oeapng.info/>



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| 4.3 School Trips | | | | | |
|------------------|--|---------------------------------|--|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 4.3.1 | Parental consent forms for school trips where there has been no major incident | | Although the consent forms could be retained for Date of birth + 22 years, the school may wish to complete a risk assessment to assess whether the forms are likely to be required and could make a decision to dispose of the consent forms at the end of the trip (or at the end of the academic year). This is a pragmatic approach and if in doubt the school should seek legal advice | SECURE DISPOSAL | Yes |
| 4.3.2 | Parental permission slips for school trips – where there has been a major incident | Limitation Act 1980 (Section 2) | Date of birth of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils | SECURE DISPOSAL | Yes |



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| 4.4 School Support Organisations | | | | | |
|--|--|----------------------|---|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| Family Liaison Officers and Home School Liaison Assistants | | | | | |
| 4.4.1 | Day books | | Current year + 2 years then review | SECURE DISPOSAL | Yes |
| 4.4.2 | Reports for outside agencies - where the report has been included on the case file created by the outside agency | | Whilst child is attending school and then destroy | SECURE DISPOSAL | Yes |
| 4.4.3 | Referral forms | | While the referral is current | SECURE DISPOSAL | Yes |
| 4.4.4 | Contact data sheets | | Current year then review, if contact is no longer active then destroy | SECURE DISPOSAL | Yes |
| 4.4.5 | Contact database entries | | Current year then review, if contact is no longer active then destroy | SECURE DISPOSAL | Yes |
| 4.4.6 | Group registers | | Current year + 2 years | SECURE DISPOSAL | Yes |
| Parent Teacher Associations and Old Pupils Associations | | | | | |
| 4.4.7 | Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations | | Current year + 6 years then review | SECURE DISPOSAL | |



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5 Central Government and Local Authority

This section covers records created in the course of interaction between the school and local authority

| 5.1 Local Authority | | | | | |
|------------------------|---|----------------------|--------------------------------|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 5.1.1 | Secondary Transfer Sheets (primary) | | Current year + 2 years | SECURE DISPOSAL | Yes |
| 5.1.2 | Attendance returns | | Current year + 1 year | SECURE DISPOSAL | Yes |
| 5.1.3 | School census returns | | Current year + 5 years | SECURE DISPOSAL | |
| 5.1.4 | Circulars and other information sent from the local authority | | Operational use | SECURE DISPOSAL | |
| 5.2 Central Government | | | | | |
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 5.2.1 | OFSTED reports and papers where a physical copy is held | | Life of the report then review | SECURE DISPOSAL | |
| 5.2.2 | Returns made to central government | | Current year + 6 years | SECURE DISPOSAL | |
| 5.2.3 | Circulars and other information sent from central government | | Operational use | SECURE DISPOSAL | |