

INVICTUS

Education Trust

**DATA RETENTION AND ERASURE
POLICY**

Approved by Board of Trustees
25 May 2021

To be reviewed by Board of Directors
April 2023

Document Provenance

Data Retention & Erasure Policy	
Committee Approval Level	Board of Trustees
Policy Author/Responsibility	Chief Operating Officer – Julie Duern
Policy First Implemented	July 2018
Frequency of Review	Every 2 Years
Next Review Date	April 2021
Policy Approved by Committee	25 May 2021
Next Review Date	April 2023

Contents	Page
1. Policy Statement	2
2. Purpose	2
3. Scope	3
4. General Data Protection Regulations (GDPR)	3
5. Objectives	3
6. Guidelines & Procedures	4
6.1 Retention Period Protocols	5
6.2 Designated Owners	5
6.3 Document Classification	5
6.4 Suspension of Record Disposal	6
6.5 Storage and Access of Records	6
7. Expiration of Retention Periods	7
7.1 Destruction/Disposal of Records	7
7.1.1 Paper Records	7
7.1.2 Electronic Records	7
7.1.3 Internal Correspondence	8
8. Erasure	8
8.1 Special Category Data	9
9. Compliance & Monitoring	10
10. Responsibilities	10
11. Retention Period	10
12. Monitoring & Review of Policy	10
13. Retention Register	11

1. POLICY STATEMENT

Invictus Education Trust recognises and understands that the efficient management of its data and records is necessary to support its core educational and business functions, to comply with its legal, statutory and regulatory obligations, to ensure the protection of personal information and to enable the effective management of the Trust.

This policy and related documents, meet the standards and expectations set out by contractual and legal requirements, and has been developed to meet the best practices of business records management, with the direct aim of ensuring a robust and structured approach to document control and systems.

Effective and adequate records and data management is necessary to:

- Ensure that the Trust conducts itself in a structured, efficient and accountable manner
- Ensure that the Trust realises best value through improvements in the quality and flow of information and greater coordination of records and storage systems
- To support core educational and business functions and providing evidence of conduct and the appropriate maintenance of associated tools, resources and outputs to clients, third parties and regulatory authorities.
- Meet legislative, statutory and regulatory requirements
- Deliver services to staff, students, parents and stakeholders in a consistent and equitable manner
- Assist in document policy formation and managerial decision making
- Provide continuity in the event of a disaster
- Protect the interests of the Trust and the rights of employees, students, parents and clients and present/future stakeholders
- The protection of personal information and data subject rights
- Avoid inaccurate or misleading data and minimise risks to personal information
- Erase data in accordance with the legislative and regulatory requirements

Information held for longer than is necessary carries additional risk and cost, and can breach data protection rules and principles. The Trust only ever retains records and information for legitimate educational/business reasons and use, and we comply fully with the General Data Protection Regulation (GDPR) Laws and guidance.

2. PURPOSE

The purpose of this document is to provide the Trust's statement of intent on how it provides a structured and compliant data and records management system, with records defined as all documents, regardless of the format, which facilitate educational/business activities, and are thereafter, retained to provide evidence of transactions and functions.

Such records may be; created, received or maintained in hard copy or in an electronic format, with the overall definition of records management being a field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use, distribution, storage and disposal of records.

3. SCOPE

This policy applies to all staff within the Trust (*meaning permanent, fixed term, and temporary staff, any third-party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with the Trust*), and pertains to the processing of personal information. Adherence to this policy is mandatory and non-compliance could lead to disciplinary action.

4. GENERAL DATA PROTECTION REGULATION (GDPR)

The Trust needs to collect personal information about the students, parents/carers, people we employ, companies we work with/ have a business relationship with, in order to effectively and compliantly carry out our everyday educational/business functions and activities. This information can include (*but is not limited to*), name, address, email address, data of birth, IP address, identification number, education records, recruitment information, employment records, medical information, private and confidential information and sensitive information.

In addition, we may occasionally be required to collect and use certain types of personal information to comply with the requirements of the law and/or regulations. However, we are committed to collecting, processing, storing and destroying all information in accordance with the **General Data Protection Regulation**, UK Data Protection Law and any other associated legal or regulatory body rules or codes of conduct that apply to the Trust and/or the information we process and store.

Our Data Retention Policy and processes comply fully with the GDPR's fifth Article 5 principle:

Personal Data shall be kept in a form which permits; identification of data subjects for no longer than is necessary, for the purposes for which the personal data are processed; personal data may be stored for longer periods, insofar, as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation')

5. OBJECTIVES

A record is information, regardless of media, created, received, and maintained which evidences the development of, and compliance with, regulatory requirements, business practices, legal policies, financial transactions, administrative activities, business decisions or agreed actions. It is the Trust's objective to implement the necessary records management procedures and systems, which assess and manage the following processes: -

- The creation and capture of records
- Compliance with legal, regulatory and contractual requirements
- The storage of records
- The protection of record integrity and authenticity
- The use of records and the information contained therein
- The security of records
- Access to and disposal of records

Records contain information that is a unique and invaluable resource to the Trust and is an important educational/operational asset. A systematic approach to the management of our records is essential to

protect and preserve the information contained in them, as well as the individuals that such information refers to. Records are also pivotal in the documentation and evidence of all educational/business functions and activities.

The Trust’s objectives and principles in relation to Data Retention are to:

- Ensure that the Trust conducts itself in an orderly, efficient and accountable manner
- Realise best value through improvements in the quality and flow of information and greater coordination of records and storage systems
- Support core educational/business functions and providing evidence of conduct and the appropriate maintenance of associated tools, resources and outputs to clients and third parties
- Meet legislative, statutory and regulatory requirements
- Deliver services to students, parents, staff and stakeholders in a consistent and equitable manner
- Provide continuity in the event of a disaster
- Protect the interests of the organisation and the rights of employees, clients and present/future stakeholders
- Ensure the safe and secure disposal of confidential data and information assets
- Ensure that records and documents are retained for the legal, contractual and regulatory period stated in accordance with each bodies’ rules or terms.
- Ensure that no document is retained for longer than is legally or contractually allowed
- Mitigate against risks or breaches in relation to confidential information

6. GUIDELINES & PROCEDURES

The Trust manage records efficiently and systematically, in a manner consistent with the GDPR requirements, ISO15489 and regulatory Codes of Practice on Records Management. Records management training is mandatory for all staff as part of the Trust’s statutory and compliance training programme and this policy is widely disseminated to ensure a standardised approach to data retention and records management.

Records will be created, maintained and retained in order to provide information about and evidence of student’s education, staff employment and the Trust’s customers and business transactions/activities. Retention schedules will govern the period that records will be retained, and can be found in the ***Record Retention Periods*** table at the end of this document.

It is our intention to ensure that all records and the information contained therein are:

- **Accurate** - records are always reviewed to ensure that they are a full and accurate representation of the transactions, activities or practices that they document
- **Accessible** - records are always made available and accessible when required (*with additional security permissions for selected staff where applicable to the document content*)
- **Complete** - records have the content, context and structure required to allow the reconstruction of the activities, practices and transactions that they document
- **Compliant** - records always comply with any record keeping legal and regulatory requirements

- **Monitored** – staff, and system compliance with this Data Retention Policy is regularly monitored to ensure that the objectives and principles are being complied with at all times and that all legal and regulatory requirements are being adhered to.

6.1 RETENTION PERIOD PROTOCOLS

All records retained during their specified periods are traceable and retrievable. Any file movement, use or access is tracked and logged, including inter-departmental changes. All Trust, student and employee and business information is retained, stored and destroyed in line with legislative and regulatory guidelines.

For all data and records obtained, used and stored within the Trust, we: -

- Carry out periodical reviews of the data retained, checking purpose, continued validity, accuracy and requirement to retain
- Establish periodical reviews of data retained
- Establish and verify retention periods for the data, with special consideration given in the below areas: -
 - the requirements of the Trust
 - the type of personal data
 - the purpose of processing
 - lawful basis for processing
 - the categories of data subjects
- Where it is not possible to define a statutory or legal retention period, as per the GDPR requirement, the Trust will identify the criteria by which the period can be determined and provide this to the data subject on request and as part of our standard information disclosures and privacy notices
- Have processes in place to ensure that records pending audit, litigation or investigation are not destroyed or altered
- Transfer paper records and data to an alternative media format in instances of long retention periods (*with the lifespan of the media and the ability to migrate data where necessary always being considered*)

6.2 DESIGNATED OWNERS

All systems and records have designated owners (Information Asset Owner - IAO) throughout their lifecycle to ensure accountability and a tiered approach to data retention and destruction. IAO, are assigned based on role, business area and level of access to the data required. The designated IAO is recorded on the Retention Register and is fully accessible to all employees. Data and records are never reviewed, removed, accessed or destroyed with the prior authorisation and knowledge of the designated IAO.

6.3 DOCUMENT CLASSIFICATION

The Trust have detailed Asset Management protocols for identifying, classifying, managing, recording and coordinating the Trust's assets (*including information*) to ensure their security and the continued protection of any confidential data they store or give access to. We utilise an **Information Asset Register (IAR)** to document and categorise the assets under our remit, and carry out regular Information Audits to identify, review and document all flows of data within the Trust.

The Information Audit enables us to identify, categorise and record all personal information obtained, processed and shared by our Trust in our capacity as a Controller and Processor and has been compiled on a central register which includes: -

- What personal data we hold
- Where it came from
- Who we share it with
- Legal basis for processing it
- What format(s) is it in
- Who is responsible for it?
- Retention periods
- Access level (*i.e. full, partial, restricted etc.*)

Our information audits and registers enable us to assign classifications to all records and data, thus ensuring that we are aware of the purpose, risks, regulations and requirements for all data types.

We utilise 5 main classification types: -

1. **Unclassified** - information not of value and/or retained for a limited period where classification is not required or necessary
2. **Public** - information that is freely obtained from the public and as such, is not classified as being personal or confidential
3. **Internal** - information that is solely for internal use and does not process external information or permit external access
4. **Personal** - information or a system that processes information that belongs to an individual and is classed as personal under the Data Protection Laws
5. **Confidential** - private information or systems that must be secured at the highest level and are afforded access restrictions and high user authentication

The classification is used to decide what access restriction needs to be applied and the level of protection afforded to the record or data. The classification along with the asset type, content and description are then used to assess the risk level associated with the information and mitigating action can then be applied.

6.4 SUSPENSION OF RECORD DISPOSAL FOR LITIGATION OR CLAIMS

If, the Trust, is served with any legal request for records/information, regarding any student, employee or business transaction or becomes the subject of an audit or investigation or we are notified of the commencement of any litigation against the Trust, we will suspend the disposal of any scheduled records until we are able to determine the requirement for any such records as part of a legal requirement.

6.5 STORAGE & ACCESS OF RECORDS AND DATA

Documents are grouped together by category and then in clear date order when stored and/or archived. Documents are always retained in a secure location, with authorised personnel being the only ones to have access. Once the retention period has elapsed, the documents are either reviewed, archived or confidentially destroyed dependant on their purpose, classification and action type.

7. EXPIRATION OF RETENTION PERIOD

Once a record or data has reached its designated retention period date, the IAO should refer to the retention register for the action to be taken. Not all data or records are expected to be deleted upon expiration; sometimes it is sufficient to anonymise the data in accordance with the GDPR requirements or to archive records for a further period.

7.1 DESTRUCTION AND DISPOSAL OF RECORDS & DATA

All information of a confidential or sensitive nature on paper, card, microfiche or electronic media must be securely destroyed when it is no longer required. This ensures compliance with the Data Protection laws and the duty of confidentiality we owe to our students, parents, employees, clients and customers.

The Trust is committed to the secure and safe disposal of any confidential waste and information assets in accordance with our contractual and legal obligations and that we do so in an ethical and compliant manner. We confirm that our approach and procedures comply with the laws and provisions made in the General Data Protection Regulation (GDPR) and that staff are trained and advised accordingly on the procedures and controls in place.

7.1.1 PAPER RECORDS

The Trust does retain paper based personal information and as such, has a duty to ensure that it is disposed of in a secure, confidential and compliant manner. The Trust utilise onsite shredding and/or a professional shredding/disposal service to dispose of all paper materials.

Employee shredding machines and confidential waste sacks are made available throughout the Trust and where we use a service provider for large disposals, regular collections take place to ensure that confidential data is disposed of appropriately.

7.1.2 ELECTRONIC & IT RECORDS AND SYSTEMS

The Trust uses numerous systems, computers and technology equipment in the running of our business. From time to time, such assets must be disposed of and due to the information held on these whilst they are active, this disposal is handled in an ethical and secure manner.

The deletion of electronic records must be organised in conjunction with the IT Department who will ensure the removal of all data from the medium so that it cannot be reconstructed. When records or data files are identified for disposal, their details must be provided to the designated owner to maintain an effective and up to date a register of destroyed records.

Only the IT Department can authorise the disposal of any IT equipment and they must accept and authorise such assets from the department personally. Where possible, information is wiped from the equipment through use of software and formatting, however this can still leave imprints or personal information that is accessible and so we also comply with the secure disposal of all assets.

In all disposal instances, the IT Department must complete a disposal form and confirm successful deletion and destruction of each asset. This must also include a valid certificate of disposal from the service provider removing the formatted or shredded asset. Once disposal has occurred, the IT Department is responsible for liaising with the information Asset Owner and updating the Information Asset Register for the asset that has been removed.

It is the explicit responsibility of the asset owner and IT Department, to ensure, that all relevant data has been sufficiently removed from the IT device and backed up, before requesting disposal.

7.1.3 INTERNAL CORRESPONDENCE AND GENERAL MEMORANDA

Unless otherwise stated in this policy or the retention periods register, correspondence and internal memoranda should be retained for the same period as the document to which they pertain or support (*i.e. where a memo pertains to a contract or personal file, the relevant retention period and filing should be observed*).

Where correspondence or memoranda that do not pertain to any documents having already be assigned a retention period, they should be deleted or shredded once the purpose and usefulness of the content ceases or at a maximum, 2 years.

Examples of correspondence and routine memoranda include (but are not limited to):

- Internal emails
- Meeting notes and agendas
- General inquiries and replies
- Letter, notes or emails of inconsequential subject matter

8. ERASURE

In specific circumstances, Data Subjects' have the right to request that their personal data is erased, however the Trust recognise that this is not an absolute '*right to be forgotten*'. Data subjects only have a right to have personal data erased and to prevent processing if one of the below conditions applies:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
- When the individual withdraws consent
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- The personal data must be erased in order to comply with a legal obligation
- The personal data is processed in relation to the offer of information society services to a child

Where one of the above conditions applies and the Trust received a request to erase data, we first ensure that no other legal obligation or legitimate interest applies. If we are confident that the Data Subject has the right to have their data erased, this is carried out by the Data Protection Officer in conjunction with any department manager and the IT team to ensure that all data relating to that individual has been erased.

These measures enable us to comply with a Data Subjects right to erasure, whereby an individual can request the deletion or removal of personal data where there is no compelling reason for its continued processing. Whilst our standard procedures already remove data that is no longer necessary, we still follow a dedicated process for erasure requests to ensure that all rights are complied with and that no data has been retained for longer than is needed.

Where we receive a request to erase and/or remove personal information from a data subject, the below process is followed:

1. The request is allocated to the Data Protection Officer and recorded on the Erasure Request Register
2. The DPO locates all personal information relating to the data subject and reviews it to see if it is still being processed and is still necessary for the legal basis and purpose it was originally intended
3. The request is reviewed to ensure it complies with one or more of the grounds for erasure: -
 - a. the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed
 - b. the data subject has withdrawn consent on which the processing is based and where there is no other legal ground for the processing
 - c. the data subject objects to the processing and there are no overriding legitimate grounds for the processing
 - d. the personal data has been unlawfully processed
 - e. the personal data must be erased for compliance with a legal obligation
 - f. the personal data has been collected in relation to the offer of information society services to a child
4. If the erasure request complies with one of the above grounds, it is erased within 30 days of the request being received
5. The DPO writes to the Data Subject and notifies them in writing that the right to erasure has been granted and provides details of the information erased and the date of erasure
6. Where the Trust has made any of the personal data public and erasure is granted, we will take every reasonable step and measure to remove public references, links and copies of data and to contact related controllers and/or processors and inform them of the data subjects request to erase such personal data

If for any reason, we are unable to act in response to a request for erasure, we always provide a written explanation to the individual and inform them of their right to complain to the Supervisory Authority and to a judicial remedy. Such refusals to erase data include:

- Exercising the right of freedom of expression and information
- Compliance with a legal obligation for the performance of a task carried out in the public interest
- For reasons of public interest in the area of public health
- For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing
- For the establishment, exercise or defense of legal claims

8.1 SPECIAL CATEGORY DATA

In accordance with GDPR requirements and Schedule 1 Part 4 of The Data Protection Bill, organisations are required to have and maintain appropriate policy documents and safeguarding measures for the retention and erasure of special categories of personal data and criminal convictions etc.

Our methods and measures for destroying and erasing data are noted in this policy and apply to all forms of records and personal data, as noted on our retention register schedule.

9. COMPLIANCE AND MONITORING

The Trust is committed to ensuring the continued compliance with this policy and any associated legislation and undertake regular audits and monitoring of our records, their management, archiving and retention. Information asset owners. are tasked with, ensuring the continued compliance and review of records and data within their remit.

10. RESPONSIBILITIES

Headteachers and information asset owners have overall responsibility for the management of records and data generated by their schools' activities, namely to ensure that the records created, received and controlled within the purview of their school, and the systems (*electronic or otherwise*) and procedures they adopt, are managed in a way which meets the aims of this policy.

Where a DPO has been designated, they must be involved in any data retention processes and records or all archiving and destructions must be retained. Individual employees must ensure that the records for which they are responsible are complete and accurate records of their activities, and that they are maintained and disposed of in accordance with the Trust's protocols.

11. RETENTION PERIODS

Section 12 of this policy contains our regulatory, statutory and business retention periods and the subsequent actions upon reaching said dates. Where no defined or legal period exists for a record, the default standard retention period is 6 years plus the current year.

12. RETENTION REGISTER

Management of the Trust/School

This section contains retention periods connected to the general management of the Trust/Schools. This covers the work of the Board of Trustees and Local Governing Bodies.

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Agendas for Board, Governors Meetings	There may be issues if the meeting is dealing with confidential issues relating to students/employees	Date of meeting + 6 Years <i>One copy of the Agenda should be retained with the master set of minutes. All other copies can be disposed of.</i>	Secure Disposal Shredded	Company Secretary Clerk PA
Minutes of Board, Governors Meetings	There may be issues if the meeting is dealing with confidential issues relating to students/employees	Date of meeting + 6 Years	Secure Disposal Shredded	Company Secretary Clerk PA
Signed master set of Board, Governors minutes		Permanent		Company Secretary Clerk PA
Reports presented to the Board, Governors	There may be issues if the reports refer to confidential information relating to students/employees	6 Years <i>However, if the minutes refer to a specific report than the report should be retained permanently with the master copy of minutes</i>	Secure Disposal Shredded	Company Secretary Clerk PA
Instruments of Government including Articles of Association		Permanent		Company Secretary
Legal documentation relating to the conversion of Academies		Permanent		Company Secretary

Action plans created and administered by the Board, Governing Body		Life of the action plain + 3 Years	Secure Disposal Shredded	Company Secretary
Policy and procedure documents created and administered by the Board, Governing Body		Life of the policy + 3 Years	Secure Disposal Shredded	Company Secretary

Management of the Trust/School

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Records relating to complaints dealt with by the Board, Governing Body	There may be issues if the reports refer to confidential information relating to students/employees	<i>Date of resolution of the complaint + a minimum of 6 Years then reviews for a further retention in case of contentious disputes.</i>	Secure Disposal Shredded	Company Secretary/PA
Annual reports created under the requirements of the ESFA, DFE, Governors Annual Reports Regulations or other regulatory bodies etc.		Date of report + 10 Years	Secure Disposal Shredded	Company Secretary/PA
Proposals concerning the change of status of an academy		Date proposal accepted or declined + 3 Years	Secure Disposal Shredded	Company Secretary/PA

Executive Headteacher/Headteacher & Senior Management Teams

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Log books of activity in the school maintained by the Headteacher	There may be data protection issues if the information refers to students/employees	Data of last entry in book + 6 Years	Secure Disposal Shredded	PA
Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refer to students/employees	Data of meeting + 3 Years	Secure Disposal Shredded	PA
Reports created by the Executive Headteacher, Headteacher, Senior Management Team or other internal administrative bodies	There may be data protection issues if the reports refer to students/employees	Data of report + 6 Years	Secure Disposal Shredded	PA
Correspondence created by Executive Headteacher, Headteacher, Senior Management Team or other internal administrative bodies	There may be data protection issues if the correspondence refers to students/employees	Data of correspondence + 3 Years	Secure Disposal Shredded	PA
Professional Development Plans	There may be data protection issues if the correspondence refers to employees	Life of Plan + 6 Years	Secure Disposal Shredded	PA
School Development Plans		Life of Plan + 3 Years	Secure Disposal Shredded	PA

Student Admissions Process

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
All records relating to the creation and implementation of the School's Admission Policy		Life of Policy + 3 Years	Secure Disposal Shredded	Student Service Officer/Attendance Officer
Admissions – if the appeal is successful	Contains information relating to an individual.	Date of Admission + 1 Year	Secure Disposal Shredded	Student Service Officer/Attendance Officer
Admissions – if the appeal is unsuccessful	Contains information relating to an individual.	Resolution of Case + 1 Year	Secure Disposal Shredded	Student Service Officer/Attendance Officer
Register of Admissions	Contains information relating to an individual.	Every entry in the Admission Register must be preserved for a period of 3 Years after the date on which the entry was made.	Review – School may wish to consider keeping the admission register permanently as often schools receive enquiries from past students to confirm the date they attended.	Student Service Officer/Attendance Officer
Admission supporting evidence – such as parents' proof of home address, medical etc.	There will be data protection issues due to the information relating to students/parents	This information should be added to the students file, if successful admitted to school.	See student file retention	Student Service Officer/Attendance Officer

		If unsuccessful the information should be retained until completion of the appeal process.	Secure Disposal Shredded	
--	--	--	--------------------------------	--

Student Management - Student's Record

This section includes all records, which are, created during the time a student spends at the school. For information about accident reporting see Health & Safety Section.

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Student's Educational Record required by the Education Pupil Information Regulations 2005	Contains information relating to the individual student	Date of Birth of Student + 25 Years	Secure Disposal Shredded	Student Service Officer/Attendance Officer
Examination Results – Student Copies				Exams Officer
- Public	Contains information relating to the individual student	This information should be added to the student file Date of Birth of Student + 25 Years	All uncollected certificates should be returned to the examination board.	Exams Officer
- Internal	Contains information relating to the individual student	This information should be added to the student file. Date of Birth of Student + 25 Years	Secure Disposal Shredded	Exams Officer
Child Protection Information held on student file.	Contains information relating to the individual student	If any records relating to child protection issues are placed on the student file. The information should be in a sealed envelope and then retained for the same period of time as the student file – Date of Leaving + 25 Years	Secure Disposal Shredded	DSL

Student Management - Student's Record

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Child Protection Information held on separate files.	Contains information relating to the individual student	Date of Leaving + 25 Years then review. This retention period was agreed in conjunction with the Safeguarding Children Group, on the understanding that the principal copy of this information will be found on the Local Authority Social Services Database/File	Secure Disposal Shredded	DSL
Attendance Registers	Contains information relating to the individual student	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 Shredded	Student Service Officer/Attendance Officer
Correspondence relating to authorised/unauthorised absence	Contains information relating to the individual student	Current academic year + 2 Years	Secure Disposal Shredded	Student Service Officer/Attendance Officer
Special Educational Needs files, reviews, and Individual Education Plans	Contains information relating to the individual student	This information should be retained in the student file. Date of Birth of Student + 25 Years	Secure Disposal Shredded	SENCO
Statement of Special Educational Needs maintained under Section 234 of the Education Act 1990 and any amendments made to the statement.	Contains information relating to the individual student	This information should be retained in the student file. Date of Birth of Student + 25 Years	Secure Disposal Shredded	SENCO
Advice and information provided to parents regarding educational needs	Contains information relating to the individual student	This information should be retained in the student file. Date of Birth of Student + 25 Years	Secure Disposal Shredded	SENCO

Student Management - Student's Record

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Accessibility Strategy	Contains information relating to the individual student	This information should be retained in the student file. Date of Birth of Student + 25 Years	Secure Disposal Shredded	SENCO

Curriculum Management

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Curriculum Returns		Current Year + 3 Years	Secure Disposal Shredded	Data Information Officer
Examination Results – School Copy	Contains information relating to the individual student	Current Year + 6 Years	Secure Disposal Shredded	Exams Officer
SATS Results	Contains information relating to the individual student	This information should be retained in the student file. Date of Birth of Student + 25 Years . The school may wish to keep a composite record of all the school year SATS results, these should be kept for current year + 6 Years to allow suitable comparison.	Secure Disposal Shredded	Exams Officer
Examination Papers	Contains information relating to the individual student	The examination papers should be kept until any appeal/validation process is complete	Secure Disposal Shredded	Exams Officer
Published Admission Number (PAN) Reports	Contains information relating to the individual student	Current Year + 6 Years	Secure Disposal Shredded	Data Information Officer
Value Added and Contextual Data	Contains information relating to the individual student	Current Year + 6 Years	Secure Disposal Shredded	Heads of Dept
Self-Evaluation Forms	Contains information relating to the individual student	Current Year + 6 Years	Secure Disposal Shredded	Heads of Dept
Schemes of Work		Current Year + 1 Year	Secure Disposal Shredded	Head of Dept

Curriculum Management

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Timetable		Current Year + 1 Year	Review records Secure Disposal, Shredded	Head of Dept
Class Record Books	May contain information relating to the individual student	Current Year + 1 Year	Review records Secure Disposal, Shredded	Head of Dept
Mark Books		Current Year + 1 Year	Review records Secure Disposal, Shredded	Head of Dept
Records of Homework set		Current Year + 1 Year	Review records Secure Disposal, Shredded	Head of Dept
Student's Work	May contain information relating to the individual student	Current Year + 1 Year Where possible student's work should be returned to the students at the end of the academic year.	Secure Disposal Shredded	Head of Dept

Extra-Curriculum Activities/Educational Visits

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Records created by Trust/Schools to obtain approval to run an Educational Visit outside the Classroom		Date of Visit + 10 Years	Secure Disposal Shredded	Trip/Activity Leader
Parental consent forms for Trust/School Trips where there has been no major incident	Contain information relating to the individual student	Conclusion of the Trip	Secure Disposal Shredded	Trip/Activity Leader
Parental consent forms for Trust/School Trips where there has been a major incident	Contain information relating to the individual student	Date of Birth of Student + 25 Years . The permission slips for all the students on the trip need to be retained to show that the rules had been followed for all students.	Secure Disposal Shredded	Trip/Activity Leader

Family Liaison Officers/Home School Liaison Officers

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Day Books	Contain information relating to the individual student	Current Year + 2 Years	Secure Disposal Shredded	Liaison Officer
Reports for outside agencies – where the report has been included on the case file created by the outside agency	Contain information relating to the individual student	Whilst the student is attending the school then destroy	Secure Disposal Shredded	Liaison Officer
Referral Forms	Contain information relating to the individual student	While the referral is current	Secure Disposal Shredded	Liaison Officer
Contact Data Sheets	Contain information relating to the individual student	Current year then review, if contract is no longer active then destroy.	Secure Disposal Shredded	Liaison Officer
Contact Database Entries	Contain information relating to the individual student	Current year then review, if contract is no longer active then destroy.	Secure Disposal Shredded	Liaison Officer
Group Registers	Contain information relating to the individual student	Current Year + 2 Years	Secure Disposal Shredded	Liaison Officer

Central Government and Local Authority

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Returns made to central government		Current Year + 6 Years	Secure Disposal Shredded	Student Services Officer
Secondary Transfer Sheets	Contain information relating to the individual student	Current Year + 2 Years	Secure Disposal Shredded	Student Services Officer
Attendance Returns		Current Year + 1 Year	Secure Disposal Shredded	Student Services Officer
School Census Returns		Current Year + 5 Years	Secure Disposal Shredded	Student Services Officer
Circulars and other information sent from the Government/Local Authority		Operational Use	Secure Disposal Shredded	PA
Ofsted Reports and papers		Life of the report then review	Secure Disposal Shredded	PA

General Operational Administration

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
General Files Series		Current Year + 5 Years then review data	Secure Disposal	PA
Records relating to the creation and publication of the Trusts/Schools brochure or prospectus.		Current Year + 3 Years	Standard Disposal	Marketing Director PA
Records relating to the creation and distribution of circulars to staff, parents or students		Current Year + 1 Years	Standard Disposal	Marketing Director PA
Newsletters and other items with a short operational use		Current Year + 1 Years	Standard Disposal	Marketing Director PA
Visitors books and signing in sheets	Contains information relating to individuals	Current Year + 6 Years	Secure Disposal Shredded	Receptionist PA
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupil Associations	Contains information relating to individuals	Current Year + 6 Years	Secure Disposal Shredded	PA

Human Resources/Payroll

This section deals with all matter of Human Resources Management in the Trust

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
All records leading up to the appointment of the new Executive Headteacher/CEO, Headteacher	Contains information relating to individuals	Date of Appointment + 6 Years	Secure Disposal Shredded	HR Director
All records leading up to the appointment of a new member of staff – unsuccessful candidates	Contains information relating to individuals	Six Months after the appointment of the successful candidate	Secure Disposal Shredded	HR Director
All records leading up to the appointment of a new member of staff – successful candidate	Contains information relating to individuals.	All the relevant information should be added to the staff personal file. Termination of employee + 6 Years	Secure Disposal Shredded	HR Director
Pre-employment vetting information for DBS checks	Contains information relating to individuals	The school does not have to keep copies of DBS certificates, these are now issued to the employee. If the school does retain a copy it should be for no longer than 6 months .	Secure Disposal Shredded	HR Director
Proof of identity collected as part of the process of checking DBS disclosure	Contains information relating to individuals	All, the relevant information should be added to the staff personal file. Termination of employee + 6 Years	Secure Disposal Shredded	HR Director
Pre-employment vetting information – evidence proving the right to work in the United Kingdom	Contains information relating to individuals	All, the relevant information should be added to the staff personal file. Termination of employee + 6 Years	Secure Disposal Shredded	HR Director

Human Resources/Payroll

This section deals with all matter of Human Resources Management in the Trust

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Staff Personal File	Contains information relating to individuals	Termination of employee + 6 Years	Secure Disposal Shredded	HR Director
Timesheets	Contains information relating to individuals	Current Year + 6 Years	Secure Disposal Shredded	HR Director
Annual Appraisal / Assessment Records	Contains information relating to individuals.	Current Year + 5 Years	Secure Disposal Shredded	HR Director
Maternity/Paternity Pay Records	Contains information relating to individuals	Current Year + 3 Years	Secure Disposal Shredded	HR Director
Records held under retirement benefits schemes.	Contains information relating to individuals	Current Year + 6 Years	Secure Disposal Shredded	HR Director

Human Resources - Management of Disciplinary / Grievance Processes

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Allegations of a child protection nature against a member of staff including where the allegation is unfounded	Contains information relating to individuals	Until the person's normal retirement age or 10 years from the date of the allegation whichever, is the longer period, then review. Note; allegations that are found to be malicious should be removed from the personnel files. If founded, they are to be retained on file, and a copy provided to the person concerned.	Secure Disposal Shredded	HR Director
Disciplinary Proceedings	Contains information relating to individuals	No Grounds for Disciplinary	If the case is not founded, then dispose of case material at the end of the case. Secure Disposal	HR Director
- Oral Warning	Contains information relating to individuals	Date of Warning + 6 months	Warning must be expunged from employee file after retention period. Secure Disposal	HR Director
- Written Warning – Level 1	Contains information relating to individuals	Date of Warning + 6 months	Warning must be expunged from employee file after retention period. Secure Disposal	HR Director
- Written Warning – Level 2	Contains information relating to individuals	Date of Warning + 12 months	Warning must be expunged from employee file after retention period. Secure Disposal	HR Director

- Final Warning	Contains information relating to individuals	Date of Warning + 18 months	Warning must be expunged from employee file after retention period. Secure Disposal	HR Director
-----------------	--	------------------------------------	--	--------------------

Health and Safety

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Health & Safety Policy Statements		Life of Policy + 3 Years	Secure Disposal Shredded	Chief Operating Officer
Health & Safety Risk Assessments		Life of Risk assessment + 3 Years	Secure Disposal Shredded	Chief Operating Officer / Facilities & Operations Manager
Records relating to accident/injury at work	Contains information relating to individuals	Date of incident + 12 Years in the case of serious accidents a further retention period will need to be applied	Secure Disposal Shredded	Chief Operating Officer / Facilities & Operations Manager
Accident Reporting:				Chief Operating Officer / Facilities & Operations Manager
- Adults	Contains information relating to individuals	Date of the incident + 6 Years	Secure Disposal Shredded	Chief Operating Officer / Facilities & Operations Manager
- Children	Contains information relating to individuals	DOB of the child + 25 Years	Secure Disposal Shredded	Chief Operating Officer / Facilities & Operations Manager

Control of Substances Hazardous to Health (COSHH)		Current Year + 40 Years	Secure Disposal Shredded	Chief Operating Officer / Facilities & Operations Manager
Process of monitoring of areas where employees, students, visitors are likely to have become in contact with Asbestos		Last action + 40 Years	Secure Disposal Shredded	Chief Operating Officer / Facilities & Operations Manager
Process of monitoring of areas where employees, students, visitors are likely to have become in contact with Radiation		Last action + 50 Years	Secure Disposal Shredded	Chief Operating Officer / Facilities & Operations Manager
Fire Precautions Log Books		Current Year + 6 Years	Secure Disposal Shredded	Chief Operating Officer / Facilities & Operations Manager

Financial Management – Accounts and Statements including Budget Management

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Annual Accounts		Current Year + 6 Years	Secure Disposal Shredded	Chief Finance Officer
Loans and grants managed by Trust/School		Date of last payment on the loan + 12 Years then review	Secure Disposal Shredded	Chief Finance Officer
Student Grant/Bursary applications	Contains information relating to individuals	Current Year + 3 Years	Secure Disposal Shredded	Senior Finance Officer
All records relating to the creation and management of budgets including Annual Budget Statements and supporting documentation		Life of the Budget + 3 Years	Secure Disposal Shredded	Senior Finance Officer
Invoices, receipts, order books, requisitions and delivery notes	May contain information relating to individuals – sole traders	Current financial year + 6 Years	Secure Disposal Shredded	Senior Finance Officer
Records relating to the collection and banking of monies	May contain information relating to individuals	Current financial year + 6 Years	Secure Disposal Shredded	Senior Finance Officer
Records relating to the identification and collection of debt.	May contain information relating to individuals	Current financial year + 6 Years	Secure Disposal Shredded	Senior Finance Officer

Financial Management - Contracts Management

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
All records relating to the management of contracts under seal	May contain information relating to individuals	Last payment on the contract + 12 Years	Secure Disposal Shredded	Chief Operating Officer Facilities & Operations Manager
All records relating to the management of contracts under signature	May contain information relating to individuals	Last payment on the contract + 6 Years then review	Secure Disposal Shredded	Chief Operating Officer Facilities & Operations Manager
Records relating to the monitoring of contracts	May contain information relating to individuals	Current year + 2 Years	Secure Disposal Shredded	Chief Operating Officer Facilities & Operations Manager

Financial Management – School Fund

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
School Fund – Cheque Books	May contain information relating to individuals	Current year + 6 Years	Secure Disposal Shredded	Senior Finance Officer
School Fund – Paying Books	May contain information relating to individuals	Current year + 6 Years	Secure Disposal Shredded	Senior Finance Officer
School Fund – Ledger	May contain information relating to individuals	Current year + 6 Years	Secure Disposal Shredded	Senior Finance Officer
School Fund – Invoices	May contain information relating to individuals	Current year + 6 Years	Secure Disposal Shredded	Senior Finance Officer
School Fund – Receipts	May contain information relating to individuals	Current year + 6 Years	Secure Disposal Shredded	Senior Finance Officer
School Fund – Bank Statements	May contain information relating to individuals	Current year + 6 Years	Secure Disposal Shredded	Senior Finance Officer
School Fund – Visits Books	May contain information relating to individuals	Current year + 6 Years	Secure Disposal Shredded	Senior Finance Officer

Financial Management – School Meals Management

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Free School Meals Registers	Contain information relating to individuals	Current year + 6 Years	Secure Disposal Shredded	Catering Manager Student Services Officer
School Meals Registers	Contain information relating to individuals	Current year + 3 Years	Secure Disposal Shredded	Catering Manager Student Services Officer
School Meals summary sheets		Current year + 3 Years	Secure Disposal Shredded	Catering Manager Student Services Officer

Property Management

This section covers the management/maintenance of buildings and property

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Title deeds of properties belonging to the Trust		Permanent These should follow the property unless the property has been registered with the Land Registry.		Company Secretary Chief Operating Officer
Plans of property belonging to the Trust		These should be retained whilst the building belongs to the Trust, and should be passed onto any new owners if the building is leased or sold.		Company Secretary Chief Operating Officer
Lease of property, leased by or to the Trust		Expiry of lease + 6 Years	Secure Disposal Shredded	Company Secretary Chief Operating Officer
Records relating to the letting of Trust premises		Current financial year + 6 Years	Secure Disposal Shredded	COO, Facilities & Operations Manager
All records relating to the maintenance of the Trust's schools carried out by contractors		Current year + 6 Years	Secure Disposal Shredded	COO, Facilities & Operations Manager
All records relating to the maintenance of the Trust's schools carried out by employees including maintenance log books	May contain information relating to individuals	Current year + 6 Years	Secure Disposal Shredded	COO, Facilities & Operations Manager

Risk/Asset Management

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

Record/Document Type	Data Protection Issues	Retention Period	Actions at the end of the administrative life of the record	Information Asset Owner IAO
Employers Liability Insurance Certificate		Closure of the School + 40 Years	Secure Disposal Shredded	Chief Operating Officer
Asset Management – Inventories of furniture and equipment		Current Year + 6 Years	Secure Disposal Shredded	Senior Finance Officer
Burglary, theft and vandalism reports/forms		Current Year + 6 Years	Secure Disposal Shredded	Facilities & Operations Manager