



# Data Retention and Disposal Policy

## PURPOSE

The Ark Data Retention and Disposal Policy details the procedures for the retention and disposal of data held by the network to ensure these processes are being carried out routinely and are correctly documented.

Date of last review:	April 2022	Author:	Data Protection Officer
Date of next review:	April 2025	Owner:	Director of Governance
Type of policy:	<input checked="" type="checkbox"/> Network-wide <input type="checkbox"/> Tailored by school	Approval:	Management Team
School:	N/A	Key Contact Name:	Governance team
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## POSITIONING WITHIN ARK OPERATIONAL MODEL

Component	Element
<input type="checkbox"/> Strategic Leadership & Planning <input checked="" type="checkbox"/> Monitoring, Reporting & Data <input checked="" type="checkbox"/> Governance & Accountabilities <input type="checkbox"/> Teaching & Learning <input type="checkbox"/> Curriculum & Assessment <input type="checkbox"/> Culture, Ethos & Wellbeing <input type="checkbox"/> Pathways & Enrichment <input type="checkbox"/> Parents & Community <input type="checkbox"/> Finance, IT & Estates <input type="checkbox"/> Our People	Data Protection

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## **Introduction**

Data should be kept for as long as they are needed to meet the operational needs of the Trust, together with any legal and regulatory requirements we must adhere to.

Documents are assessed to establish their necessity and their importance and value as a source of information about the Trust and its operations, relationships and environment and whether there are any legal and or statutory retention periods that must be adhered to.

Where documents are likely to be assessed as having historical value, or are worthy of permanent preservation, in these cases we may choose to archive those documents at the end of any statutory retention period.

## **Retention Schedule**

This retention schedule forms a key part of the management of data and information held within the network and records the predetermined retention periods for those documents.

Data records included in the schedule will be categorised as either

1. Destroy after period of retention – categories of records that have an easily identifiable predetermined retention period (e.g., destroy after 6 years)
2. Permanently Preserved – certain categories of records defined as worthy of permanent preservation and archived.
3. Review (see ‘Review’ section below) – Unknown but subject to review after defined period.

Records can be destroyed using the methods below

- Non-sensitive information (not containing personal data) can be placed in normal rubbish bins.
- Confidential Information should be destroyed of using a crosscut shredder and pulped or brunt.
- Highly Sensitive Information should be destroyed of using a crosscut shredder and pulped or brunt.
- Electronic equipment containing personal information should be destroyed of using a data destruction program and individual folders should be permanently deleted from the system.

Electronic records destroyed should be non-recoverable even if data recovery techniques are used to complete a search for that data.

This Retention Schedule will be kept up to date and new categories of data added where applicable and necessary.

## **Review**

Review or reviewing is when closed records are assessed to determine the necessity of holding this information or whether it should be destroyed, retained for a further period, or transferred to an archive for permanent preservation.

## **Data Sharing and Disposal**

Where information has been shared with third parties, we will ensure that there are adequate procedures for data retention and disposal in place and that data is handled in line with the Trust’s policies, relevant legislation, and regulatory guidance.

When sharing personal data to be processed by a Third Party for services which the Trust have entered into, we use Data Sharing Agreements to provide a level of protection to the data being shared to ensure and enforce its proper use. If this data is transferred outside of the UK or the European Economic Area (EEA), we will further protect the shared personal data by using Standard Contractual Clauses (SCCs) to ensure an adequate level of protection for the personal data transferred in accordance with Data Protection Laws.

Where personal data is shared and necessary to do so, a Data Protection Impact Assessment will be carried out. The trust will update privacy notices to reflect data sharing.

### **Record Keeping**

The disposal of documents in line with this retention and disposal policy do not need to be documented. Documents disposed of outside of this policy, either being disposed of early or kept longer than detailed below should be recorded for audit purposes.

### **Monitoring**

This policy will be monitored by the Data Protection Officer triennially or more often if required.

# Retention Schedule

## 1. Management of the School

1.1 Trust and Governing Body					
Basic file description		Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of document's retention period
1.1.1	Agendas for Trust and Governing Body meetings	Possible data protection issues if the meeting included confidential issues relating to staff	Companies Act 2006 Charities Act 2011	One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL
1.1.2	Minutes of Trust and Governing Body meetings	Possible data protection issues if the meeting included confidential issues relating to staff	Companies Act 2006 Charities Act 2011		
	Principal Set (signed)			PERMANENT	
	Inspection Copies			Date of meeting + 3 years	If these minutes contain any sensitive, personal information they must be shredded.
1.1.3	Reports presented to the Governing Body	Possible data protection issues if the meeting included confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept permanently	SECURE DISPOSAL or retain with the signed set of the minutes

1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
1.1.5	Instruments of Government including Articles of Association	No		PERMANENT	
1.1.6	Action plans created and administered by the Governing Body	No		Life of the action plan + 3 years	SECURE DISPOSAL
1.1.7	Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years	SECURE DISPOSAL
1.1.8	Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of continuous disputes	SECURE DISPOSAL
1.1.8	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
1.1.10	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No		Date proposal accepted or declined + 3 years	SECURE DISPOSAL

<b>1.2 Head Teacher and Senior Management Team</b>					
<b>Basic file description</b>		<b>Data Protection Issues</b>	<b>Retention Period</b>	<b>Action at the end of document's retention period</b>	
1.2.1	Logbooks of activity in the school maintained by the Head Teacher	Possible data protection issues if individual pupils or members of staff could be identifiable	Date of last entry in the book + a minimum of 6 years, then review		
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	Possible data protection issues if individual pupils or members of staff could be identifiable	Date of the meeting + 3 years then review	SECURE DISPOSAL	
1.2.3	Reports created by the Head Teacher or the Senior Management Team	Possible data protection issues if individual pupils or members of staff could be identifiable	Date of the report + a minimum of 3 years then review	SECURE DISPOSAL	
1.2.4	Records created by Head Teachers, deputy head teachers, heads of year, SLT and other members of staff with administrative responsibilities	Possible data protection issues if individual pupils or members of staff could be identifiable	Current academic year + 6 years then review	SECURE DISPOSAL	
1.2.5	Correspondence created by Head Teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Possible data protection issues if individual pupils or members of staff could be identifiable	Date of correspondence + 3 years then review	SECURE DISPOSAL	
1.2.6	Professional Development Plans	Yes	Life of the plan + 6 years	SECURE DISPOSAL	
1.2.7	School Development Plans	No	Life of the plan + 3 years	SECURE DISPOSAL	

<b>1.3 Admissions Process</b>					
<b>Basic file description</b>		<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at the end of document's retention period</b>

1.3.1	All records relating to the creation and implementation of the School Admissions' Policy	No	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school's adjudicators and admission appeals panels, December 2014	Life of the policy + 3 years then review	SECURE DISPOSAL
1.3.2	Admissions – if the admission is successful	Yes		Date of admission + 1 year	SECURE DISPOSAL
1.3.3	Admissions – if the appeal is unsuccessful	Yes		Resolution of case + 1 year	SECURE DISPOSAL
1.3.4	Register of Admissions	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities, October 2014	Every entry in the admission register must be preserved for a period of three years after the date the entry was made	REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past students to confirm the dates they attended the school.
1.3.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL
1.3.6	Proofs of address supplied by parents as part of the admissions process	Yes	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
1.3.7	Supplementary Information form including additional information such as religion, medical conditions etc.	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014. This data is processed under Article 6 (e) and Article 9 (g) of the UK GDPR.		



	For successful admissions			This information should be added to the pupil file	SECURE DISPOSAL
	For unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL

#### 1.4 Operational Administration

Basic file description		Data Protection Issues	Retention Period	Action at the end of document's retention period
1.4.1	General file series	No	Current year + 5 years then REVIEW	SECURE DISPOSAL
1.4.2	Records relating to the creation and publication of the school brochure or prospectus	No	Current year + 3 years	STANDARD DISPOSAL
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No	Current year + 1 year	STANDARD DISPOSAL
1.4.4	Newsletters and other items with a short operational use	No	Current year + 1 year	STANDARD DISPOSAL
1.4.5	Visitors' Books and Signing in Sheets	Yes	Current year + 6 years then REVIEW	SECURE DISPOSAL
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No	Current year + 6 years then REVIEW	SECURE DISPOSAL

## 2. Human Resources

#### 2.1 Recruitment

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of document's retention period
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2.1.1	All records leading up to the appointment of a new Head Teacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks	No	DBS Update Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months	SECURE DISPOSAL
2.1.5	Proofs of identity collected as part of the process of checking a 'Portable Enhanced DBS' disclosure	Yes		Evidence for DBS should be checked, and a record kept of what was and the date. If it is felt necessary to keep copies of documentation, this should be placed on the member of staff's personal file. If copies are kept, they not to be retained beyond 6 months.	SECURE DISPOSAL
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	An employer's guide to right to work checks [Home Office May 2015]	Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years	

<b>2.1 Recruitment</b>					
<b>Basic file description</b>		<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at the end of document's retention period</b>
2.2.1	Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal/ assessment records	Yes		Current year + 5 years	SECURE DISPOSAL

<b>2.3 Management of Disciplinary and Grievance Processes</b>					
<b>Basic file description</b>		<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at the end of document's retention period</b>
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	“Keeping children safe in education Statutory guidance for schools” and; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	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	SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			
	First Warning			Date of warning + 9 months	SECURE DISPOSAL
	Final warning			Date of warning + 12 months	(If warnings are placed on personal files, then they must be removed from the file)

	Case not found			If the incident is related to a child protection issue, see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL
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## 2.4 Health and Safety

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of document's retention period
2.4.1	Health and Safety Policy Statements	No		Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.3	Records relating to accident/ injury at work	Yes	Social Security (Claims and Payments) Regulations 1979. This data is processed under Article 6 (c) and (d) and Article 9 (b) of the UK GDPR	Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	SECURE DISPOSAL
2.4.4	Accident Reporting	Yes	Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995, Social Security (Claims and Payments) Regulations 1979. This data is processed under Article 6 (c) and (d) and Article 9 (b) of the UK GDPR		
	Adults			Date of the incident + 6 years	SECURE DISPOSAL
	Children			DOB of the child + 25 years	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	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	Current year + 40 years	SECURE DISPOSAL

			as if the 2002 Regulations had not been made. Regulation 18 (2)		
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire Precautions Logbooks	No		Current year + 6 years	SECURE DISPOSAL

## 2.5 Payroll and Pensions

2.5 Payroll and Pensions					
Basic file description		Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of document's retention period
2.5.1	Payroll / Employee / Income Tax and NI records, including maternity and sick pay records	Yes	Taxes Management Act 1970/IT (PAYE) Regulations Statutory Maternity Pay Regulations Statutory Sick Pay (General) Regulations. This data is processed under Article 6 (b) and Article 9 (b) of the UK GDPR	Current tax year + 15 years	SECURE DISPOSAL
2.5.2	Pension Records about employees and workers	Yes	As specified by Local Government pension providers	Current year + 15 years	SECURE DISPOSAL

<b>2.6 Former Employee Data</b>				
<b>Basic file description</b>		<b>Data Protection Issues</b>	<b>Retention Period</b>	<b>Action at the end of document's retention period</b>
2.6.1	Documents and data created by staff whilst employed by ARK stored within SharePoint or the Trust's other applications			
	Head Teachers, deputy head teachers, heads of year, SLT and other members of staff with administrative responsibilities	Yes	6 months from leaving date	SECURE DISPOSAL
	Staff in all other roles	Yes	3 months from leaving date	SECURE DISPOSAL

### 3. Financial Management

<b>3.1 Risk Management and Insurance</b>				
<b>Basic file description</b>		<b>Data Protection Issues</b>	<b>Retention Period</b>	<b>Action at the end of document's retention period</b>
3.1.1	Employer's Liability Insurance Certificate	No	Closure of the school + 40 years	SECURE DISPOSAL

<b>3.2 Asset Management</b>				
<b>Basic file description</b>		<b>Data Protection Issues</b>	<b>Retention Period</b>	<b>Action at the end of document's retention period</b>
3.2.1	Inventories of furniture and equipment	No	Current year + 6 years	SECURE DISPOSAL
3.2.2	Burglary, theft and vandalism report forms	No	Current year + 6 years	SECURE DISPOSAL

<b>3.3 Accounts and Statements including Budget Management</b>				
<b>Basic file description</b>		<b>Data Protection Issues</b>	<b>Retention Period</b>	<b>Action at the end of document's retention period</b>

3.3.1	Annual Accounts	No	Current year + 6 years	STANDARD DISPOSAL
3.3.2	Loans and grants managed by the school	No	Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
3.3.3	Student Grant applications	Yes	Current year + 3 years	SECURE DISPOSAL
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No	Life of the budget + 3 years	SECURE DISPOSAL
3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No	Current financial year + 6 years	SECURE DISPOSAL
3.3.6	Records relating to the collection and banking of monies	No	Current financial year + 6 years	SECURE DISPOSAL
3.3.7	Records relating to the identification and collection of debt	No	Current financial year + 6 years	SECURE DISPOSAL

<b>3.4 Contract Management</b>				
<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at the end of document's retention period</b>
3.4.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years SECURE DISPOSAL
3.4.2	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years SECURE DISPOSAL
3.4.3	Records relating to the monitoring of contracts	No		Current year + 2 years SECURE DISPOSAL

<b>3.5 School Fund</b>			
<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period</b>	<b>Action at the end of document's retention period</b>
3.5.1	School Fund - Cheque books	No	Current year + 6 years SECURE DISPOSAL

3.5.2	School Fund - Paying in books	No	Current year + 6 years	SECURE DISPOSAL
3.5.3	School Fund – Ledger	No	Current year + 6 years	SECURE DISPOSAL
3.5.4	School Fund – Invoices	No	Current year + 6 years	SECURE DISPOSAL
3.5.5	School Fund – Receipts	No	Current year + 6 years	SECURE DISPOSAL
3.5.6	School Fund - Bank statements	No	Current year + 6 years	SECURE DISPOSAL
3.5.7	School Fund – Journey Books	No	Current year + 6 years	SECURE DISPOSAL

### 3.6 School Meals Management

Basic File Description		Data Protection Issues	Retention Period	Action at the end of document's retention period
3.6.1	Free School Meals Registers	Yes	Current year + 6 years	SECURE DISPOSAL
3.6.2	School Meals Registers	Yes	Current year + 3 years	SECURE DISPOSAL
3.6.3	School Meals Summary Sheets	No	Current year + 3 years	SECURE DISPOSAL

### 3.7 Insurance

Basic File Description		Data Protection Issues	Retention Period	Action at the end of document's retention period
3.7.1	Claims correspondence	Yes	Date of settlement + 3 years	SECURE DISPOSAL

## 4. Property Management

### 4.1 Property Management

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of document's retention period
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4.1.1	Title deeds of properties belonging to the school	No		PERMANENT These should follow the property unless the property has been registered with the Land Registry	
4.1.2	Plans of property belong to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold.	
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
4.1.5	Closed Circuit Television (CCTV)	Yes	The Protection of Freedoms Act 2012 The Surveillance Camera Code of Practice 2013 (the 'SCCOP') The Data Protection Act 2018. This data is processed under Article 6 (e) and (f) and Article 9 (d) and (g) of the UK GDPR.	Footage should be kept for 31 days.	SECURE DISPOSAL

<b>4.2 Maintenance</b>					
<b>Basic file description</b>		<b>Data Protection Issues</b>	<b>Retention Period</b>	<b>Action at the end of document's retention period</b>	
4.2.1	All records relating to the maintenance of the school carried out by contractors	No	Current year + 6 years	SECURE DISPOSAL	
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance logbooks	No	Current year + 6 years	SECURE DISPOSAL	

## 5. Pupil Management

5.1 Pupil's Educational Record					
Basic file description		Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of document's retention period
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 N°1437. This data is processed under Article 6 (e) and Article 9 (g) of the UK GDPR.		
	Primary			Retain whilst the child remains at the primary school	The file should follow the pupil when they leave the primary school. This includes: <ul style="list-style-type: none"> <li>• to another primary school</li> <li>• to a secondary school</li> <li>• to a pupil referral unit</li> <li>• If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period.</li> <li>• If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period.</li> </ul>
	Secondary			Date of Birth of the pupil + 25 years	SECURE DISPOSAL
5.1.2	Examination Results – Pupil Copies	Yes			

	Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.
	Internal			This information should be added to the pupil file	
5.1.3	Child Protection information held on pupil file	Yes	Keeping Children Safe in Education Statutory Guidance for Schools and Colleges March 2015, Working Together to Safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015.	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.	SECURE DISPOSAL – these records MUST be shredded
5.1.4	Child protection information held in separate files	Yes	This data is processed under Article 6 (e) and Article 9 (g) of the UK GDPR.	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	SECURE DISPOSAL – these records MUST be shredded

<b>5.2 Attendance</b>					
<b>Basic file description</b>		<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at the end of document's retention period</b>
5.2.1	Attendance Registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014. This data is processed under Article 6 (e)	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL

			and Article 9 (g) of the UK GDPR.		
5.2.2	Correspondence relating to authorised absence		Education Act 1996 Section 7. This data is processed under Article 6 (e) and Article 9 (g) of the UK GDPR.	Current academic year + 2 years	SECURE DISPOSAL

### 5.3 Special Educational Needs

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of document's retention period
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2). This data is processed under Article 6 (e) and Article 9 (g) of the UK GDPR.	Date of Birth of the pupil + 25 years	REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time as evidence in a “failure to provide a sufficient education” case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.
5.3.2	Statement or Education, Health and Care Plan maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1. This data is processed under Article 6 (e) and Article 9 (g) of the UK GDPR.	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold

5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2. This data is processed under Article 6 (e) and Article 9 (g) of the UK GDPR.	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold
5.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14. This data is processed under Article 6 (e) and Article 9 (g) of the UK GDPR.	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold

## 6. Curriculum Management

6.1 Statistics and Management Information					
Basic file description		Data Protection Issues	Retention Period	Action at the end of document's retention period administrative life of the record	
6.1.1	Curriculum returns	No	Current year + 3 years	SECURE DISPOSAL	
6.1.2	Examination Results (Schools Copy)	Yes	Current year + 6 years	SECURE DISPOSAL	
	SATS Records	Yes			
	Results		The SATS results should be recorded on the pupil's educational file and therefore retained until the pupil reaches 25 years of age. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL	
	Examination Papers		The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL	

6.1.3	Published Admission Number (PAN) Reports	Yes	Current year + 6 years	SECURE DISPOSAL
6.1.4	Value Added and Contextual Data	Yes	Current year + 6 years	SECURE DISPOSAL
6.1.5	Self Evaluation Forms	Yes	Current year + 6 years	SECURE DISPOSAL

## 6.2 Implementation of Curriculum

Basic file description		Data Protection Issues	Retention Period	Action at the end of document's retention period
6.2.1	Schemes of Work	No	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
6.2.2	Timetable	No	Current year + 1 year	
6.2.3	Class Record Books	No	Current year + 1 year	
6.2.4	Mark Books	No	Current year + 1 year	
6.2.5	Record of homework set	No	Current year + 1 year	
6.2.6	Pupils' Work	No	Where possible pupils' work should be returned to the pupil at the end of the academic year. If this is not the school's policy then work should be kept for current year + 1 year	SECURE DISPOSAL

## 7. Extracurricular Activities

### 7.1 Educational Visits outside the Classroom

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of document's retention period
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7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Outdoor Education Advisers’ Panel National Guidance website <a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 - “Legal Framework and Employer Systems” and Section 4 - “Good Practice”.	Date of visit + 14 years	SECURE DISPOSAL
7.1.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Outdoor Education Advisers’ Panel National Guidance website <a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 - “Legal Framework and Employer Systems” and Section 4 - “Good Practice”.	Date of visit + 10 years	SECURE DISPOSAL
7.1.3	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low.
7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	

7.2 Walking Bus					
Basic file description		Data Protection Issues	Retention Period	Action at the end of document’s retention period	
7.2.1	Walking Bus Registers	Yes	Date of register + 3 years This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting.	SECURE DISPOSAL [If these records are retained electronically any backup copies should be destroyed at the same time]	

			This data is processed under Article 6 (d) and (e) and Article 9 (c) and (g) of the UK GDPR.	
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### 7.3 Family Liaison Officers and Home School Liaison Assistants

Basic file description		Data Protection Issues	Statutory Provision	Retention Period	Action at the end of document's retention period
7.3.1	Day Books	Yes		Current year + 2 years then REVIEW	SECURE DISPOSAL
7.3.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes	Working Together to Safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015.	Whilst child is attending school and then destroy.	SECURE DISPOSAL
7.3.3	Referral forms	Yes	This data is processed under Article 6 (e) and Article 9 (g) of the UK GDPR.	While the referral is current	SECURE DISPOSAL
7.3.4	Contact data sheets	Yes		Current year then REVIEW. If contact is no longer active, then destroy.	SECURE DISPOSAL
7.3.5	Contact database entries	Yes		Current year then REVIEW. If contact is no longer active, then destroy.	SECURE DISPOSAL
7.3.6	Group Registers	Yes		Current year + 2 years	SECURE DISPOSAL

## 8. Central Government and Local Authority

### 8.1 Local Authority

Basic File Description		Data Protection Issues	Retention Period	Action at the end of document's retention period
8.1.1	Secondary Transfer Sheets (Primary)	Yes	Current year + 2 years	SECURE DISPOSAL
8.1.2	Attendance Returns	Yes	Current year + 1 year	SECURE DISPOSAL



8.1.3	School Census Returns	No	Current year + 5 years	SECURE DISPOSAL
8.1.4	Circulars and other information sent from the Local Authority	No	Operational use	SECURE DISPOSAL

## 8.2 Central Government

Basic File Description		Data Protection Issues	Retention Period	Action at the end of document's retention period
8.2.1	OFSTED reports and papers	No	Life of the report then REVIEW	SECURE DISPOSAL
8.2.2	Returns made to central government	No	Current year + 6 years	SECURE DISPOSAL
8.2.3	Circulars and other information sent from central government	No	Operational use	SECURE DISPOSAL

## 9. Communication

9.1					
Basic File Description		Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of document's retention period
9.1.1	Emails sent and received internally and with external bodies, agencies, companies and individuals	Yes	Data Protection Act 2018. This data is processed under Article 6 (e) and (f) and Article 9 (d) of the UK GDPR.	Current academic year + 2 academic years (e.g., CY is 2021/ 2022 all emails before and including a/c year 2018/2019 can be disposed of). This applies to communication and emails sent for operational and administrative tasks within the trust, not general communication.	SECURE DISPOSAL

## 10. Competitions conducted by Ark, Ark Schools, Ark Ventures, and Ark Initiatives

10.1					
Basic File Description		Data Protection Issues	Retention Period	Action at the end of document's retention period	
10.1.1	Competition and survey data	Yes	Closing date of competition or survey + 3 months	SECURE DISPOSAL	

## 11. Governance

11.1						
Basic File Description		Data Protection Issues	Statutory Provision	Retention Period	Action at the end of document's retention period	
11.1.1	Whistleblowing documents	Yes	Public Interest disclosure Act 1998	6 months following the outcome	SECURE DISPOSAL	
11.1.2	Subject access request documents	Yes	Data Protection Act 2018	12 months following completion the of the request	SECURE DISPOSAL	
11.1.3	Freedom of Information request and Environmental Information Regulation request documents	Yes	Data Protection Act 2018	2 years following completion the of the request	SECURE DISPOSAL	
11.1.4	Complaints	Yes		6 years following resolution of the complaint	SECURE DISPOSAL	

## 12. Alumni/ Alumnae

12.1						
Basic File Description		Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of document's retention period	
12.1.1	Alumni contact and personal details	Yes	Data Protection Act 2018. This data is processed under Article 6 (a) and Article 9 (a) of the UK GDPR.	Whilst consent is valid	SECURE DISPOSAL	

### 13. Biometric Data

13.1					
Basic File Description		Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of document's retention period
13.1.1	Fingerprints	Yes	Data Protection Act 2018. This data is processed under Article 6 (a) and Article 9 (a) of the UK GDPR.	Whilst child attends the school.	SECURE DISPOSAL

**APPENDIX 1**



**Confirmation of Secure Disposal Form**

This form should be used where documents or records have been disposed of before their listed retention period. Any documents to be disposed before the agreed retention period must be approved by the Trust’s Data Protection Officer.

Central Team or Academy Name	Document or Record Name	Description	N° of files to be Destroyed	Reason for Disposal	Method of Disposal	Date of Disposal

<b>Approved by DPO:</b>		<b>Presented to LGB:</b>		<b>Signed by Chair or Director of Governance:</b>	
<b>Signed:</b>		<b>Date:</b>		<b>Signed:</b>	
<b>Date:</b>				<b>Date:</b>	

Attach proof or confirmation of secure disposal if available