



PEMBROKE HOUSE



DATA RETENTION AND DISPOSAL POLICY

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1. Policy Statement

- 1.1. Pembroke House School (“The School”) recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations.
- 1.2. It also recognises that efficient management of its records will contribute to the effective management of school activities.
- 1.3. This policy sets out guidelines for storing, managing, and disposing of records, whether held on paper or electronically.
- 1.4. For avoidance of doubt, any records relating to criminal or civil proceedings with which the school is a party to shall be preserved and should under no circumstances be deleted, destroyed or purged. The records may be of great assistance to the school in defending claims made in later years.

2. Purpose of the Policy

- 2.1. The purpose of this Policy is to provide retention limits and disposal methods for all data held by The School.

3. Scope of this Policy

This policy covers all data: -

- 3.1. held or controlled by the School. This includes physical data such as hard copy documents, forms, contracts, notebooks, letters, and invoices. It also includes electronic data such as emails, electronic documents, audio and video recordings and CCTV recordings. It applies to both personal data and non-personal data.
- 3.2. that is held by third parties on our behalf, for example our marketing service providers and information systems service providers. It also covers data that belongs to us but is held by employees on personal devices in accordance with The School’s Bring Your Own Device Policy.

4. Guiding Principles

Through this Policy, and our data retention practices, The School aims to meet the following commitments: -

- 4.1. comply with legal and regulatory requirements on data retention.
- 4.2. comply with our data protection obligations, in particular to keep personal data no longer than is necessary for the purposes for which it is processed (storage limitation principle).
- 4.3. handle, store and dispose of data responsibly and securely.
- 4.4. allocate appropriate resources, roles and responsibilities to the retention and disposal of data.
- 4.5. regularly remind employees of their data retention responsibilities.
- 4.6. regularly monitor and audit compliance with this Policy and update this Policy when required.

5. Roles and Responsibilities

5.1. The School Council: The School Council has the ultimate responsibility for ensuring that the School complies with the Data Protection Legislation.

5.2. Head and Bursar: The Head and Bursar will be responsible for the dissemination of this Policy and the application of consequences.

5.3. The Data Protection Officer (“DPO”): The DPO will be responsible for:-

- o advising on and monitoring our compliance with data protection laws which regulate personal data.
- o ensuring the retention requirements for personal data in their functional areas are met.
- o monitoring compliance with this Policy in relation to personal data.
- o Each function shall also arrange for the proper storage and retrieval of data.

5.4. Employees

- o All employees must comply with this Policy, the Record Retention Schedule, any communications suspending data disposal and any specific instructions from the Head or Bursar.
- o Failure to do so may subject The School, its employees, and contractors to serious civil and/or criminal liability. An employee’s failure to comply with this Policy may result in disciplinary sanctions, including suspension or termination. It is therefore the responsibility of everyone to understand and comply with this Policy.

6. Records Maintained by the School

6.1. Pupil Records

- o A file is kept on each pupil.
- o The file holds:
 - o the registration, admission and acceptance form, (the parent contract) and the academic record of a pupil as they progress through the School.
 - o reports of conversations between parents and members of staff about academic or pastoral issues, school reports, references from previous schools and references prepared for universities and other institutions.
 - o any disciplinary sanctions imposed on a pupil.
 - o The record identifies those with parental responsibility for the pupil and any court orders affecting parental responsibility or the care of the pupil.
- o The information held on the school’s electronic management information system covers: the pupil's name, address, House, and emergency contact details, academic performance, subjects studied and daily attendance. Confidentiality of personal information is protected.

6.2. Pupils with special educational, welfare or medicinal needs

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- o The names of pupils with special educational, welfare or medical needs are recorded and any special provision to be made for individual pupils are made available to those staff who need to know that information.

6.3. Medical Records

- o A confidential medical record on each pupil is kept securely by the School's medical staff
- o The medical record contains:
 - o the medical/health questionnaire that the parents complete when their child joins the School, and subsequent medical information provided by parents and/or pupils and records of all treatment and immunisations that a pupil receives during their time at the School.
 - o any significant known drug reactions, major allergies and notable medical conditions.
- o Relevant information is available to staff who are likely to administer medication or treatment.
- o The catering department holds details of pupils with food allergies.
- o The School's management information system identifies any pupils with a medical or chronic condition, via a flagging system, so that staff are aware and can obtain further information if/when required, for example if the pupil is attending a school trip.
- o Access to full medical records is restricted to Medical staff.

6.4. Safeguarding Files

- o The school's records on child protection are password protected and saved in a designated system accessible to Designated and Deputy Designated Safeguarding Leads (DSLs).
- o Where a pupil leaves the School, the DSL will ensure that their child protection file is transferred to the new school (separately from any other pupil information shared) as soon as possible.
- o The DSL will ensure secure transit and obtain confirmation of receipt. The DSL may retain a record of the child protection file in case of any historic safeguarding concern.

6.5. Counseling

- o Counseling records are stored in accordance with guidance from the Kenya Counselling and Psychological Association (KCPA), of which the School's counselors are required to be members, and are retained for three years.

6.6. Financial Records

- o The Bursar and the Accounts department hold financial records on pupils and parents / fee payers throughout their time at the School.
- o These include a record of the deposit, the acceptance form, bills for tuition fees and extras throughout a pupil's time at the School. If a pupil receives a bursary or

scholarship, this will form part of the pupil record, along with records of annual assessments and awards.

6.7. Access by Staff

- o Teaching and operational staff are able to access the School's password protected electronic record systems where it is necessary for their role. Teaching staff may also consult paper pupil records held, as necessary.
- o Access to financial records is restricted to the Heads, Bursar and the relevant Bursary / Accounts staff.

6.8. Data Protection/Privacy Notice

- o Parents accept a place for their child at Pembroke House School in the knowledge that data about pupils and their parents will be collected periodically and stored and processed in order to allow for the efficient operation of the school in line with the Data Protection Act (as amended or superseded).

6.9. Access by parents and pupils

- o The School's Data Protection / Privacy Notices describe its duties and obligations under the Data Protection Act (as amended or superseded), including parents' rights and the rights of pupils aged 12 or over to have access to their personal data. It also covers the circumstances under which data would be disclosed to a third party.

6.10. Staff Records

- o The School maintains records of personnel relating to employees' qualifications, experience, length of service, salary levels, medical questionnaire, disciplinary notes, grievance notes, right to work in the UK and all other required statutory documentation.
- o All documentation is kept in secure filing cabinets and on the HR database system. All material is kept securely after employment has finished so that references can be written and as per Appendix 1.
- o Access to staff records is available only to those where it is necessary for their role, including the HR team, Payroll Officer and Line Managers where applicable

7. Staff Training

- o New staff are given training regarding data protection and accessing and managing school records as part of their induction to The School. Staff are provided with ongoing guidance and training updates regarding data protection, in particular the security of personal and special category data.

8. Records of Past Pupils and the School Archive

- o We keep all records of past pupils until a pupil is 25 years old. At that point, we retain records of the following within the School Archive:
 - o Registration Form.

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- o Final Confirmation of Entry Form.
- o Leavers Form.
- o All public examination results.
- o Information on any achievements, prizes or events of importance.
- o A brief description of any examination considerations.
- o All other information on the pupil file is securely destroyed unless there has been a safeguarding concern.

9. Considerations for Retention Periods

- 9.1. When establishing and/or reviewing retention periods, the following shall be taken into account:
- o The rights of the data subject
 - o The objectives and requirements of The School
 - o The type of personal data in question
 - o The purpose for which the data in question is collected, held and processed
 - o The School's legal basis for collecting, holding, and processing that data
 - o The category or categories of data subject to whom the data relates
- 9.2. If a precise retention period cannot be fixed for a particular type of data, the DPO shall establish a criterion to determine retention periods, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.
- 9.3. Notwithstanding the defined retention periods as provided in Annex1, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within The School to do so i.e., whether in response to a request by a data subject or otherwise.
- 9.4. In limited circumstances, it may also be necessary to retain personal data for longer periods where such retention is for archiving purposes that are in the public interest, for scientific or historical research purposes, or for statistical purposes.
- 9.5. All such retention will be subject to the implementation of appropriate technical and organisational measures to protect the rights and freedoms of data subjects, as required by the Data Protection Legislation.

10. Destruction of Records

- 10.1. Upon expiry of the data retention periods set out in Annex 1, or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise disposed of as follows:
- o Personal data stored electronically in flat files such as spreadsheets, emails and other documents and on all IT systems shall be deleted according to measures put in place by the ICT team.

- o Where data fields/records are only marked for deletion, rather than actually deleted, the system vendor will be asked to securely delete the data
- o Personal data stored in hardcopy form shall be shredded using an approved cross-cut shredder, or specialist third party company
- o All physical storage systems being disposed of shall be wiped or overwritten or in any other way established by the School.

10.2. Where an external provider is used it is recommended that

- o All records must be shredded on-site in the presence of an employee.
- o The organisation must also be able to prove that the records have been destroyed by the company who should provide a Certificate of Destruction. Staff working for the external provider should have been trained in the handling of confidential documents.
- o The shredding needs to be planned with specific dates and all records should be identified as to the date of destruction.

10.3. The school shall maintain a log of all records that have been destroyed. The log shall contain: -

- o A description of the record to be destroyed
- o Name of officer authorizing the destruction
- o Date when record was destroyed
- o Persons that undertook the destruction.

11. Where to go for Advice and Questions

Any questions about this Policy should be referred to the Data Protection Officer at dpo@pembrokehouse.sc.ke who is in charge of administering, enforcing, and updating this Policy.

12. Changes to this Manual

- 12.1.1. The School reserves the right to modify this manual from time to time to accurately reflect the regulatory environment and data protection principles.
- 12.1.2. Where any material changes are made to this manual, The School shall without undue delay notify its employees.

A. Management of the School

This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Headteacher and the senior management team, the admissions process and operational administration.

1. Governing Body					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1	Agendas for Governing Body meetings + Minutes of Governing Body meetings	Yes	PERMANENT	SECURE DISPOSAL ¹	
2	Reports presented to the Governing Body	Yes	PERMANENT	SECURE DISPOSAL	
3	Meeting papers relating to the annual parents' meeting	No	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL	
4	Instruments of Government including Articles of Association	No	PERMANENT	SECURE DISPOSAL	
5	Action plans created and administered by the Governing Body	No	Life of the action plan + 3 years	SECURE DISPOSAL	
6	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 contentious disputes	SECURE DISPOSAL	
7	Reports created pursuant to Pembroke House Laws and Regulations	No	As per Pembroke House Retention periods		

¹ In this context SECURE DISPOSAL should be taken to mean disposal using a cross cut shredder. If electronically kept disposal using current anonymization, deletion or encryption technologies.

B. Pupil Management

This section includes all records which are created during admissions and the time a pupil spends at the school. For information about accident reporting see under Health and Safety above

2. Pupil's Educational Record					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1	Admissions: Applications forms, assessments; records of decisions	Yes	PERMANENT; If pupil is not admitted 7 years from decision	SECURE DISPOSAL	
2	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes			
	Primary		Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school. ²	
3	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		
4	Child Protection information held on pupil file		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	

² This will include: (i) to another primary school (ii) to a secondary school (iii) to a pupil referral unit (iv) If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period. Primary Schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the record from the Local Authority

5	Child protection information held in separate files		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	
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3. Attendance					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1	Attendance Registers	Yes	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL	
2	Correspondence relating to authorized absence		Current academic year + 2 years	SECURE DISPOSAL	

4. Special Educational Needs					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1	Special Educational Needs files, reviews and Individual Education Plans	Yes	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 to defend themselves 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.	

2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold	
			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	
			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. Statistics and Management Information					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1	Curriculum returns	No	Current year + 3 years	SECURE DISPOSAL	
2	Examination Results (Schools Copy)	Yes	Current year + 6 years	SECURE DISPOSAL	
	CE records –	Yes			
	Results		The CE results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year CE 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	
3	Published Admission Number (PAN) Reports	Yes	Current year + 6 years	SECURE DISPOSAL	
4	Value Added and Contextual Data	Yes	Current year + 6 years	SECURE DISPOSAL	
5	Self-Evaluation Forms	Yes	Current year + 6 years	SECURE DISPOSAL	

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6. Implementation of Curriculum

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1	Schemes of Work	No	Current year + 1 year	Review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL	
2	Timetable	No	Current year + 1 year		
3	Class Record Books	No	Current year + 1 year		
4	Mark Books	No	Current year + 1 year		
5	Record homework set	No	Current year + 1 year		
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 current year + 1 year	SECURE DISPOSAL	

7. Educational Visits outside the Classroom

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Date of visit + 14 years	SECURE DISPOSAL	
2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Date of visit + 10 years	SECURE DISPOSAL	

7. Educational Visits outside the Classroom

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 and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.	
4	Parental permission slips for school trips – where there has been a major incident	Yes	<p>DOB of the pupil involved in the incident + 25 years</p> <p>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</p>		

8. School Bus Registers

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
5	Walking Bus Registers	Yes	Date of register + 3 years	<p>SECURE DISPOSAL</p> <p>[If these records are retained electronically any back up copies should be destroyed at the same time]</p>	

9. Safeguarding Records					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1	Policies and Procedures	No	PERMANENT	SECURE DISPOSAL	
2	DBS disclosure certificates	Yes (potentially sensitive personal data & must be secure)	No longer than 6 months from decision on recruitment, unless DBS specifically consulted but a record of the checks being made must be kept, if not the certificate itself.	SECURE DISPOSAL	
3	Accident/Incident record	Yes	Keep on record for as long as any living victim may bring a claim (NB civil claim limitation periods can be set aside in cases of abuse). Files to be reviewed from time to time if resources allow and a suitably qualified person is available		
4	Safeguarding/Child Protection Files (including where a pupil has transferred to another school)	Yes	If a referral has been made / social care have been involved or child has been made subject of a multi-agency plan – indefinitely. If low level concerns, with no multi-agency act - apply applicable school level individual assessment. This may be 25 years from date of birth or indefinitely.		
5	Counselling Records	Yes	Three years - based on advice from the Kenyan Counselling and Psychological Association.		

10. Parent and Alumni Records					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1	Contact details for parents and other next of kin i.e., emergency contact details	Yes	Duration of pupil's time in school (potential to keep beyond if notified accordingly of change of lawful bases)	SECURE DISPOSAL	
2	Alumni (Past and Present Records) <ul style="list-style-type: none"> • Contact details for alumni/past parents • Communication records • Research on alumni/past parents 	Yes	Lifetime of Alumni/past parent (subject to review of consent/legitimate interest)	SECURE DISPOSAL	
3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff	Date of the report + a minimum of 3 years then review	SECURE DISPOSAL	
4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff	Current academic year + 6 years then review	SECURE DISPOSAL	
5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff	Date of correspondence + 3 years then review	SECURE DISPOSAL	
6	Professional Development Plans	Yes	Life of the plan + 6 years	SECURE DISPOSAL	
7	School Development Plans	No	Life of the plan + 3 years	SECURE DISPOSAL	

11. Operational Administration					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1	General file series	No	Current year + 5 years then REVIEW	SECURE DISPOSAL	
2	Records relating to the creation and publication of the school brochure or prospectus	No	Current year + 3 years	STANDARD DISPOSAL	
3	Records relating to the creation and distribution of circulars to staff, parents or pupils	Yes	Current year + 1 year	STANDARD DISPOSAL	
4	Newsletters and other items with a short operational use	Yes	Current year + 6 years then REVIEW	STANDARD DISPOSAL	
5	Visitors' Books and Signing in Sheets	Yes	Current year + 6 years then REVIEW	SECURE DISPOSAL	
6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	Yes	Current year + 6 years then REVIEW	SECURE DISPOSAL	

C. Human Resources

This section deals with all matters of Human Resources management within the school.

12. HR Records					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1	Single Central Record of employees	Yes	Keep a permanent record (not DBS certificate itself) of all mandatory checks that have been undertaken.		
2	Contracts of employment	Yes	7 years from effective date of end of contract	SECURE DISPOSAL	
3	Payroll, salary, maternity pay records, employee appraisals, health records or reviews and staff personal files	Yes	7 years after the termination of the contract		
4	Pre-employment vetting information –	Yes	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		
5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes	Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file		
6	Immigration records	Yes	7 years after the termination of the contract		

13. Health and Safety					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1	Health and Safety Policy Statements	No	Life of policy + 3 years	SECURE DISPOSAL	
2	Health and Safety Risk Assessments	No	Life of risk assessment + 3 years	SECURE DISPOSAL	
3	Records relating to accident/ injury at work	Yes	Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL	
4	Accident Reporting	Yes			
	Adults		Date of the incident + 6 years	SECURE DISPOSAL	
	Children		DOB of the child + 25 years	SECURE DISPOSAL	
5 2.4. 5	Control of Substances Hazardous to Health (COSHH)	No	Current year + 40 years	SECURE DISPOSAL	
6 2.4. 6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Last action + 40 years	SECURE DISPOSAL	
7 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	
8 2.4. 8	Fire Precautions log books	No	Current year + 6 years	SECURE DISPOSAL	

D. Financial Management of the School

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

3.1 Insurance Records

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1	Insurance policies (will vary – private, public and professional indemnity)	No	Duration of policy (or as required by policy) plus a period for any run-off arrangement and coverage of insured risks: ideally, until it is possible to calculate that no living person could make a claim.	SECURE DISPOSAL	
2	Correspondence related to claims/renewals/notification	Yes	7 years	SECURE DISPOSAL	

3.2 Asset Management

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
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	

3.3 Accounts and Statements including Budget Management					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
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	Yes	Current financial year + 6 years	SECURE DISPOSAL	
3.3.7	Records relating to the identification and collection of debt	Yes	Current financial year + 6 years	SECURE DISPOSAL	

3.4 Contract Management					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
3.4.1	All records relating to the management of contracts under seal	No	Last payment on the contract + 12 years	SECURE DISPOSAL	
3.4.2	All records relating to the management of contracts under signature	No	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	

3.5 School Meals

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
3.5.1	School Meals Registers	Yes	Current year + 3 years	SECURE DISPOSAL	
3.5.2	School Meals Summary Sheets	No	Current year + 3 years	SECURE DISPOSAL	

E. Property Management

This section covers the management of buildings and property.

4.1 Property Management					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
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	

4.2 Maintenance					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
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 log books	No	Current year + 6 years	SECURE DISPOSAL	

F. List of School Records and Data safely destroyed

The following sheet can be completed or alternatively documented in a spreadsheet.

Ref Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of destruction	Confirm (i) Safely destroyed (ii) In accordance with Data Retention Guidelines Tick (✓)
<i>e.g.</i>	<i>School Invoices</i>	<i>Copies of purchase invoices dated 2011/12</i>	<i>Folders marked "Purchase Invoices 2011/12" 1 to 3</i>	<i>3 Folders</i>	<i>Shredding</i>	✓
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						

Written: July 2023 – IR, CT, MAM & EM
Next Review: October 2024