



This retention schedule contains recommended retention periods for the different record series created and maintained by the schools Data Protection Officer. This schedule refers to all information regardless of the media in which it is stored (if records are retained electronically any backup copies should be destroyed at the same time). Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the General Data Protection Regulations 2016. Except for those that are governed by statute, if record series are to be kept for longer or shorter periods than laid out in this document, the reasons for this need to be documented.

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Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
1. Child Protection				
1.1 Child Protection Files	Yes	Education Act 2002, s175, related guidance "Safeguarding Children in Education" September 2004.	DOB + 25 years	SECURE DISPOSAL
1.2 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 Colleges March 2015"; 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. Details of allegations that are found to be malicious should be removed from personnel records.	SECURE DISPOSAL- MUST BE SHREDDED

NB: 1 year means 1 academic year.

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
2. Governors and Governing Body				
2.1 Minutes	If dealing with confidential issues			SECURE DISPOSAL ¹
<ul style="list-style-type: none"> Principal's Set 			Permanent	If the school is unable to store these then they should be offered to a secure archive service.
<ul style="list-style-type: none"> Inspection minutes 			Date of meeting + 3 years	SECURE DISPOSAL
2.2 Agendas	If dealing with confidential issues		One copy to be retained with master set of minutes. All other copies to be disposed of.	SECURE DISPOSAL
2.3 Reports	If containing confidential information about staff		Date of report + minimum 6 years or if minutes refer directly to individual reports then kept in existence with referenced report.	SECURE DISPOSAL or retain with signed set of minutes
2.4 Annual Parents meeting documents	Potential	S33 Education Act 2002	Date of meeting + minimum 6 years	SECURE DISPOSAL
2.5 Instruments of Government	No		Permanent	Retain while school remains open or archived with a secure archiving company.
2.6 Trusts and Endowments	No		Permanent	Retain in school whilst operationally required or archived with a secure archiving company.
2.7 Action Plans	No		Date of action plan + 3 years	SECURE DISPOSAL

¹ To mean shred/put into confidential waste bins.

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2.8 Policy Documents	No		Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)	SECURE DISPOSAL
2.9 Records relating to complaints dealt with by Governing body.	Yes	Limitation Act 1980	Date of resolution of complaint + 6 years then review in case of contentious disputes.	SECURE DISPOSAL
2.10 Annual Reports required by the Department for Education	No	Education (Governors' Annual Reports) (England)(Amendment)Regulations 2002.SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
2.11 Proposals for schools to become or be established as Specialist Status schools	No		Date proposal accepted or declined +3 years	SECURE DISPOSAL

Basic File Description	Data Protection	Statutory Provisions	Retention Period	Action at the end of administrative life of the
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	Issues			record
3. Head Teacher and Senior Management Team				
3.1 Log Books maintained by Head Teacher	Yes if reference to individuals		Date of last entry in the book + minimum 6 years then review	SECURE DISPOSAL
3.2 Minutes of the Senior Management Team and other internal administrative bodies	Yes if reference to individuals		Date of meeting + 3 years then review	SECURE DISPOSAL
3.3 Reports made by the Head Teacher or the Management Team	Yes if reference to individuals		Date of report + minimum 6 years then review	SECURE DISPOSAL
3.4 4 Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes if reference to individuals		Closure of file + 6 years	SECURE DISPOSAL
3.5 Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes if reference to individuals		Date of correspondence + 3 years then review	SECURE DISPOSAL
3.6 Professional development plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
3.7 School development plans	No		Life of the plan + 3 years	SECURE DISPOSAL

Basic File Description	Data	Statutory Provisions	Retention Period	Action at the end of
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	Protection Issues			administrative life of the record
4. Admissions Process				
4.1 All records relating to the creation and implementation of the School Admissions Policy	No	School Admission Code Statutory Guidance for admission authorities, governing bodies, school adjudicators and admission appeals panels December 2014	Life of the Policy + 3 years then review	SECURE DISPOSAL
4.2 Admissions -if the admission is successful	Yes	School Admission Code Limitation Act	Date of admission + 1 year and added to pupil file	SECURE DISPOSAL
4.3 Admissions - if the appeal is unsuccessful	Yes	School Admission Code Statutory Guidance for admission authorities, governing bodies, school adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
4.4 Registry of admissions	Yes	School attendance: School attendance guidance for maintained schools, academies, independent schools and local authorities November 2016.	Preserved for 3 years after entry	Schools must notify the local authority when a pupil's name is to be deleted from the admission register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 SECURE DISPOSAL
4.5 Admissions - Secondary Schools -Casual	Yes		End of student relationship + 1 year	SECURE DISPOSAL
4.6 Proofs of address supplied by parents as part of the admissions process	Yes		Current year + 1 year	SECURE DISPOSAL
4.7 Supplementary Information form including additional information such as religion, medical	Yes		End of student relationship + 1 year	SECURE DISPOSAL

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conditions etc.				
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Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
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5. Pupils				
5.1 Admission Registers	Yes		Current year of last entry + 6 years	SECURE ARCHIVE UNTIL Date of Destruction
5.2 Attendance registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities 2016.	Date of Register + 3 years	SECURE DISPOSAL [If these records are retained electronically any backup copies should be destroyed at the same time]
5.3 Pupil's Educational Record	Yes	Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		SECURE DISPOSAL
5.3a. PRIMARY			Retain whilst the child remains at the school	This file should follow the pupil when he/she leaves the primary school: <ul style="list-style-type: none"> • To another primary school • To a secondary school • To a pupil referral unit • If the pupil dies whilst at primary school the file should be returned to the Local Authority and be retained for statutory retention. If the pupil decides to transfer to an independent school, home schooling or leaves the country, the file should be returned to the Local Authority.
5.3b. SECONDARY		Limitation Act 1980 (Section 2)	DOB of the pupil + 25 years	SECURE DISPOSAL
5.5 Special Educational Needs Files, review and	Yes		DOB of the pupil + 25 years then review	Review whether these are held by the Local Authority

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Individual Education plans				and if both require this data. SECURE DISPOSAL
5.6 Correspondence Relating to Authorised Absence and Issues	No		Date of absence + 2 years	SECURE DISPOSAL
5.7 Examination results				
5.7a. Public	No		This information should be added to pupil file	All uncollected certificates to be returned to examining body
5.7b. Internal	Yes		This information should be added to pupil file	If these records are retained on the pupil file or in their National Record of Achievement they need only be kept for as long as operationally necessary. SECURE DISPOSAL
5.8 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.”	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
5.9 Child Protection Information held on separate files	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.”	End of relationship with pupil + 1 year on the understanding that the principal copy of this information will remain with Local Authority social services.	SECURE DISPOSAL- these records must be shredded
5.10 Any other records created in the course of contact with pupils	Yes/No		Termination of student relationship + 6 years	Review at the end of 6 years and either allocate a record retention policy or SECURE

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				DISPOSAL.
5.11 Student work	Yes		Return to student at end of academic year. If not possible, retain for current academic year + 1 year.	SECURE DISPOSAL
5.12 Dyslexia Screening	Yes		Primary – DOB + 25 years Secondary - Termination of relationship with student + 6 years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
6. Extra-curricular activities				

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6.1 Parental permission slips for school trips - where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for DOB + 25 years, the requirement for them is low. Possible to archive.
6.2 Parental permission slips for school trips - where there has been a major incident	Yes	Limitation Act 1980	DOB of the pupil involved in the incident + 25 years The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils	SECURE DISPOSAL
6.3 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 http://oeapng.info specifically section 3 – "Legal Framework and Employer Systems" and Section4 "Good Practice".	Date of visit + 14 years	SECURE DISPOSAL
6.4 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 http://oeapng.info specifically section 3 – "Legal Framework and Employer Systems" and Section4 "Good Practice".	Date of visit + 10 years	SECURE DISPOSAL
6.5 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 [Electronic back-ups to be destroyed at the same time]

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
7. Special Educational Needs				
7.1 SEN files, reviews and individual educational plans	Yes	Limitation Act 1980	DOB + 25 years (maintained in student file)	Review Note: Some Local

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				Authorities will keep SEN files for a longer period of time in case of a claim. Business risk analysis.
7.2 Statement maintained under The Education Act 1996 – Section 234	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	DOB + 25 years (maintained in student file)	SECURE DISPOSAL
7.3 Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	DOB of pupil + 25 years (maintained in student file)	SECURE DISPOSAL unless subject to a legal hold
7.4 Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	DOB of pupil + 25 years (maintained in student file)	SECURE DISPOSAL unless subject to a legal hold

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
8. Curriculum				
8.1 School Development Plan	No		Current year + 6 years	SECURE DISPOSAL
8.2 Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL

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8.3 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 new retention period or SECURE DISPOSAL
8.4 Timetable	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
8.5 Class record books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
8.6 Mark Books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
8.7 Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
8.8 Pupils' work	No		Current year + 1 year OR return to student at the end of the academic year where possible.	SECURE DISPOSAL
8.9 Examination results SATS records -	Yes		SATS Should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years.	These may be passed on to HE or FE. SECURE DISPOSAL

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			The school may wish to keep a composite record of the whole year SATs results.	
8.10 Examination Papers	Yes		Examination papers should be kept until any further appeal/validation process is complete.	SECURE DISPOSAL PSEUDONYMISATION
8.11 PAN Reports	Yes		Current year + 6 years	SECURE DISPOSAL
8.12 Value added and contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
8.13 Self Evaluation forms	Yes		Current year + 6 years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
9. Recruitment				
9.1 All records leading up to	Yes		Date of Appointment + 6	SECURE DISPOSAL

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the appointment of a new Head Teacher			years	
9.2 All records leading up to the new appointment of a new member of staff- unsuccessful candidate	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
9.3 All records leading up to the new appointment of a new member of staff- successful candidate	Yes		All relevant information to be added to staff personal file and all other info retained for 6 months	SECURE DISPOSAL
9.4 Interview notes and recruitment records	Yes		Date of interview + 6 months	SECURE DISPOSAL
9.5 Pre-employment vetting information - DBS checks	Potential	DBS Update service Employer Guide June 2014: Keeping children safe in education July 2015 (Dept. Education s73, 74).	The school does NOT have to keep DBS certificates. If the schools does, do not keep for more than 6 months.	SECURE DISPOSAL
9.6 Pre-employment vetting information – Evidence proving the right to work in the UK.	Yes	An employer’s guide to right to work checks [Home Office August 2017]	Store on staff personal file for duration of their employment + 2 years	SECURE DISPOSAL
9.7 Proof of identity collected as part of the ‘portable’ enhanced DBS disclosure.	Yes		Where possible these should be checked and a note kept of what was seen and checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file.	SECURE DISPOSAL
9.8 Timesheets, sick pay	Yes		Current year + 6 years	SECURE DISPOSAL
9.9 Staff Personal files	Yes	Limitation Act 1980 (section 2)	Date of termination + 6 years	SECURE DISPOSAL

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9.10 Disciplinary proceedings:	Where the warning relates to child protection issues see 1.2. If the disciplinary proceedings relate to a child protection matter please contact your safeguarding children officer for further advice.			
9.10a oral warning	Yes		Date of warning + 6 months	SECURE DISPOSAL
9.10b written warning level 1	Yes		Date of warning + 6 months	SECURE DISPOSAL
9.10c written warning level 2	Yes		Date of warning + 12months	SECURE DISPOSAL
9.10d final warning	Yes		Date of warning + 18 months	SECURE DISPOSAL
9.10e case not found	Yes		If incident is child protection related see 1.2 otherwise dispose of at conclusion of the case.	SECURE DISPOSAL
9.11 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
9.12 Annual appraisal/assessment records	Yes		Current year + 5 years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
10. Health and Safety				
10.1 Health and Safety Policy Statement	No		Life of Policy + 3 years	SECURE DISPOSAL
10.2 Accessibility Plans	No	Equality Act 2010	Current year + 6 years	SECURE DISPOSAL
10.3 Accident reporting:	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992		Retain copy of Health and Safety Policy published at the time of the accident

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		Section 8. Limitation Act 1980 JSP 375 Pt.2 Vol 1 (V1.0 Jan 16) Government Guidance		with this file.
• Adults			Date of incident + 6 years	SECURE DISPOSAL
• Children			DOB + 25 years	SECURE DISPOSAL
10.4 Control Of Substances Hazardous to Health OSHH	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 as if the 2002 regulations had not been made. Regulation 18(2).	Current year + 40 years	SECURE DISPOSAL
10.5 Risk Assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
10.6 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
10.7 Process of monitoring of areas where employees and persons are likely to have come in contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
10.8 Fire Precautions log books	No		Current year + 6 years	SECURE DISPOSAL
10.9 CCTV footage	Yes		Automatically destroyed after 30 days unless investigation. End of investigation + review.	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
11. Administrative				
11.1 General Files series	No		Current year + 5 years then review	SECURE DISPOSAL
11.2 Records relating to the creation and publication	No		Current year + 3 years	STANDARD DISPOSAL

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of the school brochure or prospectus				
11.3 Records of circulars to staff parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
11.4 Newsletters and items with short operational use	No		Current year + 1 year	STANDARD DISPOSAL
11.5 Visitors Books and Signing in sheets	Yes		Current year + 6 years then review	SECURE DISPOSAL
11.6 PTA/Old Pupils Associations			Current year + 6 years then review	Review to see whether a further retention period is required

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
12. Asset management and Insurance				
12.1 Employer's Liability certificate	No		School Closure + 40 years	SECURE DISPOSAL
12.2 Inventories of equipment and furniture	No		Current year + 6 years	SECURE DISPOSAL
12.3 Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
13. Finance				
13.1 Annual Accounts	No	Financial Regulations	Current year + 6 years	STANDARD DISPOSAL
13.2 Loans and grants	Yes	Financial Regulations	Date of last payment on loan + 12 years then review	Review to see whether further retention is necessary
13.3 Contracts	No			
13.3a under seal	No	Limitation Act 1980	Last payment+ 12 years	SECURE DISPOSAL

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13.3b under signature	No	Limitation Act 1980	Last payment + 6 years	SECURE DISPOSAL
13.3c monitoring records			Current year + 2 years	SECURE DISPOSAL
13.4 Copy orders	No		Current year + 2 years	SECURE DISPOSAL
13.5 Budget reports, budget monitoring, budget statements etc.	No		Life of budget + 3 years	SECURE DISPOSAL
13.6 Invoice, receipts, other records covered by the Financial Regulations	No		Current financial year + 6 years	SECURE DISPOSAL
13.7 Annual Budget and background papers	No		Current financial year + 6 years	SECURE DISPOSAL
13.8 Order books and requisitions	No		Current financial year + 6 years	SECURE DISPOSAL
13.9 Delivery Documentation	No		Current financial year + 6 years	SECURE DISPOSAL
13.10 Debtors' Records, Collection and Banking monies	No	Limitation Act 1980	Current financial year + 6 years	SECURE DISPOSAL
13.11 School Fund-Cheque books	No		Current year + 3 years	SECURE DISPOSAL
13.12 School Fund-Paying in book	No		Current year + 6 years then review	SECURE DISPOSAL
13.13 School Fund - Ledger	No		Current year + 6 years then review	SECURE DISPOSAL
13.14 School Fund - Invoices	No		Current year + 6 years then review	SECURE DISPOSAL
13.15 School Fund - Receipts	No		Current year + 6 years	SECURE DISPOSAL
13.16 School Fund - Bank statements	No		Current year + 6 years then review	SECURE DISPOSAL
13.17 School Fund-School Journey books	No		Current year + 6 years then review	SECURE DISPOSAL
13.18 Student grant	Yes		Current year + 3 years	SECURE DISPOSAL

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applications				
13.19 Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
13.20 School meals summary sheet	No		Current year + 3 years	SECURE DISPOSAL
13.21 Petty cash books	No		Current year + 6 years	SECURE DISPOSAL

14. Payroll				
14.1 Salary cards	Yes			
14.2 Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year + 3 years	SECURE DISPOSAL
14.3 Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year+ 6 years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
15. Property				
15.1 Title Deeds of property belonging to the school	No		Permanent- These should follow the property unless the property has been registered at the Land Registry	
15.2 Plans of property belonging to the school	No		Permanent	Retain in school whilst operational
15.3 Maintenance and contractor records	No		Current year + 6 years	SECURE DISPOSAL

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15.4 Leases of property belonging to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
15.5 Record relating to the Lettings of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
15.6 Maintenance log books	No		Current year + 6 years	SECURE DISPOSAL
15.7 Contractors' Reports	No		Current year + 6 years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
16. Local Authority				
16.1 Secondary transfer sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
16.2 Attendance returns	Yes		Current year + 1 year	SECURE DISPOSAL
16.3 Circulars from Local Authority	No		Whilst required operationally then review	SECURE DISPOSAL
16.4 Census Returns	No		Operational Use	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
17. Central Government				
17.1 OFSTED reports and papers	No		Life of report then review	SECURE DISPOSAL
17.2 Returns	No		Current year + 6 years	SECURE DISPOSAL
17.3 Circulars from Department for Children, Schools and Families	No		Operational Use	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
18. External agreements				
18.1 Service Level Agreements	Potential		Until superseded	SECURE DISPOSAL
18.2 Data sharing agreements	Potential		Until superseded	SECURE DISPOSAL
18.3 Work experience agreements	Yes		DOB of pupil + 25 years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
19. School Meals				
19.1 Dinner Register	Yes		Current year + 3 years	SECURE DISPOSAL
19.2 School meals summary sheets			Current year + 3 years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of administrative life of the record
20. Family Liaison Officers and Home School Liaison Assistants				
20.1 Day Books	Yes		Current year + 2 years then review	SECURE DISPOSAL
20.2 Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Termination of student relationship	SECURE DISPOSAL
20.3 Referral forms	Yes		While the referral is current	SECURE DISPOSAL
20.4 Contact data sheets	Yes		Current year then review, if	SECURE DISPOSAL

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			contact is no longer active then destroy	
20.5 Contact data base entries			Current year then review, if contact is no longer active then destroy	DELETE
20.6 Group Registers	Yes		Current year + 2 years	SECURE DISPOSAL