



Triumph Learning Trust

Aspiration - Collaboration - Innovation

Records Management and Retention Policy

Policy Details

Policy Level	Trust
Document Approver	Trust Board
Document Status	Final
Applicable to	All Trust Employees
Review Frequency	Every Year

Revision History

Revision	Date	Details	Owner	Approved by
0	28 April 2025	First Issue	Laura Withington – E&CM	PIC
1	June 2026	Revision 1	Laura Withington – E&CM	ARC

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1. Introduction

The Trust recognises that by efficiently managing their records, they will be able to comply with their legal and regulatory obligations, and to contribute to the effective overall management of the schools. Maintaining good records helps to provide the evidence needed to protect the legal rights and interests of the trust and its schools, and for them to demonstrate their performance and accountability.

This policy provides the framework through which the trust and schools will effectively manage their records.

This policy applies to all records created, received or maintained by permanent and temporary staff of the school in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the school.

Records are defined as all information created, received, stored or maintained by the Trust in any format, including paper records, electronic records, emails, audio recordings, video recordings, text messages, databases and cloud-based systems.

2. Scope of Policy

This policy meets the requirements of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018) and the Freedom of Information Act 2000 (FOIA 2000). It is based on the IRMS Toolkit For Schools, Department for Education (DfE) Data Protection Toolkit for Schools, Department for Education (DfE) – Annual Review of School Records and Safe Destruction Checklist, and guidance published by the Information Commissioner's Office (ICO) on the UK GDPR.

This policy also supports compliance with:

- Keeping Children Safe in Education (current edition)
- Equality Act 2010
- Children and Families Act 2014
- Environmental Information Regulations 2004
- Information Commissioner's Office (ICO) Accountability Framework

3. Responsibilities

The Trust recognises it has a statutory obligation to adopt formal policies and establish workplace procedures for dealing with Records Management and Retention, The Trust recognises that Records Management and Retention rules and procedures promote good employment relations and is committed to dealing with matters in a fair and consistent way.

The Data Protection Champions are responsible for providing advice and guidance under this policy and reviewing and updating the policy as required.

Triumph Learning Trust	Trust Estates and Compliance Manager
Rugby Free Primary School	School Operations Manager

Rugby Free Secondary School	School Operations Manager
Alderman's Green Primary School	School Operations Manager
Courthouse Green Primary School	School Operations Manager
Cawston Grange Primary School	School Operations Manager

The Trust Board is the Data Controller for all personal data processed by the Trust.

The Trust has appointed a Data Protection Officer (DPO) who provides independent advice and monitoring in accordance with Article 39 UK GDPR.

Data Protection Champions support operational compliance within schools and Trust departments.

The Board of Trustees is responsible for ensuring that high standards of corporate governance are maintained. The Chair of the Trust is responsible for managing the CEO, Trustees and Governors under this policy.

The Trust Board has a statutory responsibility to ensure that the schools maintain records and record keeping systems in accordance with the regulatory framework of the school.

The CEO has overall responsibility for ensuring effective implementation of this policy and compliance with applicable data protection and records management legislation. Headteachers are responsible for acting as representatives of the data controller on a day-to-day basis and the implementation of and compliance with this policy within their school ensuring competence in those staff who are responsible for and involved in the operation of this policy and associated guidance.

Although the Headteacher is responsible overall for the implementation of this policy in their school, managers have some specific responsibilities:

Applying this policy within their own department and area of work

All staff have a responsibility to comply with this policy and to co-operate with the schools' leadership and management on all matters relating to it

Undertake any training recommended by their line manager

It is the responsibility for all members of staff to ensure that the trust and schools do not keep personal information for longer than is necessary for the purpose or purposes for which it was collected.

The trust and schools will manage and document its records disposal process in line with the guidance provided by the IRMS Toolkit for Schools.

It is the responsibility of all members of the school to ensure that they:

Manage school records consistently in accordance with school's policies and procedures

Properly document their actions and decisions

Hold personal information securely

Only share personal information appropriately and do not disclose it to an unauthorised third party

Dispose of records securely in accordance with the guidance set out in Appendix 1.

Staff who do not comply with this policy may face disciplinary action.

This policy does not form part of any employee's contract of employment and may be amended at any time

Managers must ensure that records within their area are retained, reviewed and securely disposed of in accordance with this policy.

4. Retention Records

The retention periods set out in Appendix 1 are based on the current IRMS Schools and Academies Toolkit, statutory requirements and recognised education sector best practice. The Trust will periodically review and update retention periods to ensure ongoing compliance.

The Trust's Records Retention Schedule is based upon the current IRMS Schools and Academies Toolkit and applicable legislation. Where the IRMS Toolkit is updated, the Trust may adopt revised retention periods to maintain compliance with current best practice unless statutory requirements specify otherwise.

5. Legal Hold and Suspension of Disposal

Where litigation, safeguarding investigations, disciplinary proceedings, insurance claims, audits, complaints, Freedom of Information requests, Subject Access Requests or regulatory investigations are ongoing or reasonably anticipated, records scheduled for destruction must be retained until the matter has concluded.

6. Safe Destruction of Records

All records containing personal information, or sensitive policy information will be made either unreadable

- Paper records should be shredded using a cross-cutting shredder
- CDs / DVDs / Floppy Disks should be cut into pieces
- Audio / Video Tapes and Fax Rolls should be dismantled and shredded

Electronic media must be securely erased, destroyed or disposed of using a certified data destruction process in accordance with ICO guidance and recognised industry standards. Any other records will be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways.

Do not put records containing personal information with the regular waste or a skip.

Where an external provider is used, Approved confidential waste contractors must provide documented evidence of secure destruction, including certificates of destruction where appropriate. 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 will be trained in the handling of confidential documents.

The shredding will be planned with specific dates and all records will be identified as to the date of destruction.

PLEASE NOTE: if the records are recorded as 'to be destroyed' but have not yet been destroyed and a request for the records has been received they MUST still be provided.

7. Data Subject Rights

Individuals have rights under UK GDPR including:

- Right of access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to object
- Right to data portability (where applicable)

Records must be retained and managed in a manner that supports these rights.

8. Freedom of Information Act 2000

The Freedom of Information Act 2000 requires us to maintain a list of records which have been destroyed and who authorised their destruction

When destroying either a substantial amount of information or information which is of a particularly sensitive or important nature, members of staff should record at least:

- The information that has been destroyed
- The volume of the information that has been destroyed
- Who provided authorisation to destroy the information
- The date the information was destroyed

By following this guidance and completing the Annual Checklist, the trust and schools will ensure that our school is compliant with the Data Protection rules and the Freedom of Information Act 2000.

Each area of the trust maintains a destruction log maintained by the Data Protection Champions. The destruction of any records will be detailed in this log.

9. Appendices

Appendix 1	Records and Retention Schedule
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Appendix 1 - Records and Retention Schedule

1. Records relating to child protection

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
1.1	Child protection files	Yes	Education Act 2002, s175, related guidance "Safeguarding Children in Education",	DOB + 25 years minimum Records relating to child sexual abuse should be retained until the individual's 75th birthday or longer where required by safeguarding guidance and legal advice	Secure disposal
1.2	Allegation of child protection nature against a member of staff, including where the allegation is unfounded	Yes	Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance). Education Act 2002 Guidance Keeping Children Safe in Education (current edition)	Retain details of substantiated, unfounded and unsubstantiated allegations until normal retirement age or 10 years from the allegation, whichever is longer. Malicious allegations should be removed from personnel records	Secure disposal

2. Records relating to Trust

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
2.1	Minutes -				
2.1a	Principal set (signed)	No		Permanent	Must be available in school for 6 years from the meeting. Can then be archived/stored elsewhere.
2.1b	Inspection copies	No		Date of meeting + 3 years	Secure disposal
2.2	Agendas	No		Date of meeting	Secure disposal
2.3	Reports	No		Date of report + 6 years	Retain in school for 6 years from report date. Can consider archiving/storing anything important.
2.4	Annual parents' meeting papers	No		Date of meeting + 6 years	Retain in school for 6 years from meeting

					date. Can consider archiving/storing anything important.
2.5	Instruments of Government	No		Permanent	Retain in school whilst school open. Can then be archived/stored elsewhere.
2.6	Trusts and Endowments	No		Permanent	Retain in school whilst operationally required. Can then be archived/stored elsewhere.
2.7	Action plans	No		Date of action plan + 3 years	Secure disposal
2.8	Policy documents	No		Expiry of policy	Retain in school whilst policy operational (this includes if the expired policy is part of a past decision making process).
2.9	Complaints files	Yes		Date of resolution of complaint + 6 years	Review for further retention in the case of contentious disputes. Secure disposal.
2.10	Annual reports required by Dept of Education	No	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI2002 No1171	Date of report + 10 years	Secure disposal
2.11	Proposals for schools to become or be established as Specialist Status schools	No		Current year + 3 years	Secure disposal

3. Records relating to school management

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
3.1	Log books	Yes		Date of last entry in book + 6 years	Secure disposal

3.2	Minutes of the senior management team and other internal administrative bodies	Yes		Date of meeting + 5 years	Retain in school for 5 years from meeting date. Can consider archiving/storing anything important.
3.3	Reports made by the head teacher or management team	Yes		Date of report + 3 years	Retain in school for 3 years from report date. Can consider archiving/storing anything important.
3.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		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	No/Yes		Date of correspondence + 3 years	Secure disposal
3.6	Professional development plans	Yes		Closure + 6 years	Secure disposal
3.7	School development plans	No		Closure + 6 years	Review for further retention. Secure disposal.
3.8	Admissions - if the admission is successful	Yes		Admission + 1 year	Secure disposal
3.9	Admissions - if the appeal is unsuccessful	Yes		Resolution of case + 1 year	Secure disposal
3.10	Admissions - secondary schools - casual	Yes		Current year + 1 year	Secure disposal
3.11	Proof of address supplied by parents as part of the admissions process	Yes		As the corresponding admission record	Secure disposal
3.12	Supplementary information form including additional information such as religion, medical conditions supplied as part of the admissions process	Yes		As the corresponding admission record	Secure disposal

4. Records relating to pupils

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
4.1	Admission registers	Yes		Entry + 7 years	Retain in school for 7 years from entry. Can consider archiving these records if have the facility.
4.2	Attendance registers	Yes		Date of register + 3 years	Secure disposal
4.3	Pupil files retained in schools	Yes			
4.3a	Primary	Yes		Retain for time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school.

4.3b	Secondary	Yes	Limitation Act 1980	Date of birth + 25 years	Transfer to another secondary school if required. In the case of exclusion, it may be appropriate to transfer the record to the Pupil Referral Unit. Secure disposal
4.4	Pupil files	Yes			
4.4a	Primary	Yes		Retain for time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school.
4.4b	Secondary	Yes	Limitation Act 1980	Date of birth + 25 years	Transfer to another secondary school if required. In the case of exclusion it may be appropriate to transfer the record to the Pupil Referral Unit. Secure disposal
4.5	Special Educational Needs files, reviews and individual education plans	Yes		Date of birth + 25 years	Secure disposal
4.6	Correspondence relating to authorised absence and issues	Yes		Date of absence + 2 years	Secure disposal
4.7	Examination results				
4.7a	Public	No		Year of examination + 6 years	Secure disposal
4.7b	Internal examination results	Yes		Current year + 5 years	Secure disposal
4.8	Any other records created in the course of contact with pupils	Yes/No		Current year + 3 years	Review at the end of 3 years and retain with pupil file if necessary. Secure disposal
4.9	Education, Health and Care Plan (EHCP)	Yes	Special Educational Needs and Disability Act 2001 Section 1	Date of birth + 30 years	Secure disposal unless legal action is pending
4.10	Draft, amended or ceased Education, Health and Care Plans	Yes	Special Educational Needs and Disability Act 2001 Section 1	Date of birth + 30 years	Secure disposal unless legal action is pending
4.11	Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Closure + 12 years	Secure disposal unless legal action is pending
4.12	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12 years	Secure disposal unless legal action is pending
4.13	Parental permission slips for school trips, where there has been no major incident	Yes		Conclusion of the trip	Secure disposal unless legal action is pending
4.14	Parental permission slips for school trips, where there has been a major incident	Yes	Limitation Act 1980	Date of birth of pupil involved in the incident + 25 years	Secure disposal. Permission slips for all pupils on trip need to be retained for period to show that the rules had been followed for all pupils.
4.15	Records created by schools to obtain approval to run an educational visit	No	3 part supplement of the Health & Safety of Pupils on	Date of visit + 14 years	Secure disposal

	outside the classroom, primary schools		Educational Visits (HASPEV) (1998)		
4.16	Records created by schools to obtain approval to run an educational visit outside the classroom, secondary schools	No	3 part supplement of the Health & Safety of Pupils on Educational Visits (HASPEV) (1998)	Date of visit + 10 years	Secure disposal
4.17	Walking bus registers	Yes		Date of register + 3 years	This takes into account that if an incident requiring an accident report, the register will be submitted with the accident report and kept for the retention time for accident reporting. Secure disposal

5. Records relating to child Curriculum

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
5.1	School development plan	No		Current year + 6 years	Secure disposal
5.2	Curriculum returns	No		Current year + 3 years	Secure disposal
5.3	Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.4	Timetable	No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.5	Class record books	Yes/No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.6	Mark books	Yes/No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.7	Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.8	Pupils' work	Yes		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.9	Examination results	Yes		Current year + 6 years	Secure disposal
5.10	SATs records, examination papers and results	Yes		Current year + 6 years	Secure disposal
5.11	PAN reports	Yes		Current year + 6 years	Secure disposal
5.12	Value added and contextual data	Yes		Current year + 6 years	Secure disposal

5.13	Self evaluation forms	Yes		Current year + 6 years	Secure disposal
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6. Records relating to personnel records

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
6.1	Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	Secure disposal
6.2	Staff personnel files	Yes		Termination + 6 years	Secure disposal
6.3	Interview notes and recruitment records	Yes		Date of interview notes + 6 months if unsuccessful. If successful place in personnel file.	Secure disposal
6.4	Pre-employment vetting information (including DBS checks)	Yes	Enhanced DBS disclosures	Retain only information permitted by DBS Code of Practice. Disclosure certificates should not normally be retained for longer than six months.	Secure disposal
6.5	Disciplinary proceedings	Yes	Where the warning relates to child protection issues see 1.2		
6.5a	Oral warning	Yes		Date of warning + 6 months	Secure disposal
6.5b	Written warning - level one	Yes		Date of warning + 6 months	Secure disposal
6.5c	Written warning - level one	Yes		Date of warning + 12 months	Secure disposal
6.5d	Final warning	Yes		Date of warning + 18 months	Secure disposal
6.5e	Case not found	Yes		If child protection see 1.2, otherwise destroy immediately	Secure disposal
6.6	Records relating to accident/injury at work	Yes		Date of incident + 12 years	In case of serious accidents a further retention period will need to be applied. Secure disposal
6.7	Annual appraisal and assessment records	Yes		Current year + 5 years	Secure disposal
6.8	Salary cards	Yes		Last date of employment + 85 years	Secure disposal
6.9	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI 1999/567)	Current year + 3 years	Secure disposal
6.10	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	Secure disposal

6.11	Proofs of identity collected as part of the process for checking "portable" enhanced Enhanced DBS disclosures	Yes		Where possible these should be checked and a note/copy of what was checked placed on personnel file. If felt necessary to keep any documentation this should also be placed in personnel file.	Secure disposal of notes/copies and return of originals.
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7. Records relating to health and safety

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
7.1	Accessibility plans	Yes	Equality Act 2010	Current year + 6 years	Secure disposal
7.2	Accident reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		Secure disposal
7.2a	Adults	Yes		Date of incident + 7 years	Secure disposal
7.2b	Children	Yes		Date of birth of child + 7 years	Secure disposal
7.3	COSHH			Current year + 10 years	Where appropriate an additional retention period may be allocated. Secure disposal
7.4	Incident reports	Yes		Current year + 20 years	Secure disposal
7.5	Policy statements			Date of expiry + 1 year	Secure disposal
7.6	Risk assessments			Current year + 3 years	Secure disposal
7.7	Process of monitoring areas where employees and persons are likely to have come in contact with asbestos			Last action + 40 years	Secure disposal
7.8	Process of monitoring areas where employees and persons are likely to have come in contact with radiation			Last action + 50 years	Secure disposal
7.9	Fire precautions log book			Current year + 6 years	Secure disposal

8. Administrative records

Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
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8.1	Employer's liability certificate			Closure of school + 40 years	Secure disposal
8.2	Inventories of equipment and furniture			Current year + 6 years	Secure disposal
8.3	General file series			Current year + 5 years	Review to see if further retention period required. Secure disposal
8.4	School brochure or prospectus			Current year + 3 years	Disposal
8.5	Circulars (staff, parents, pupils)			Current year + 1 year	Review to see if further retention period required. Secure disposal
8.6	Newsletters, ephemera			Current year + 1 year	Review to see if further retention period required. Secure disposal
8.7	Visitors book			Current year + 2 year	Review to see if further retention period required. Secure disposal
8.8	PTA/Old Pupils Associations			Current year + 6 years	Review to see if further retention period required. Secure disposal

9. Records relating to Finance

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
9.1	Annual accounts		Financial Regulations	Current year + 6 years	Secure disposal
9.2	Loans and grants		Financial Regulations	Date of last payment on loan + 12 years	Secure disposal
9.3	Contracts				
9.3a	Under seal			Contract completion date + 12 years	Secure disposal
9.3b	Under signature			Contract completion date + 6 years	Secure disposal
9.3c	Monitoring records			Current year + 2 years	Secure disposal
9.4	Copy orders			Current year + 2 years	Secure disposal
9.5	Budget reports, budget monitoring etc.			Current year + 3 years	Secure disposal
9.6	Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year + 6 years	Secure disposal
9.7	Annual budget and background papers			Current year + 6 years	Secure disposal
9.8	Order books and requisitions			Current year + 6 years	Secure disposal

9.9	Delivery documentation			Current year + 6 years	Secure disposal
9.10	Debtors' records		Limitations Act	Current year + 6 years	Secure disposal
9.11	School fund - Cheque books			Current year + 3 years	Secure disposal
9.12	School fund - Paying in books			Current year + 6 years	Secure disposal
9.13	School fund - Ledger			Current year + 6 years	Secure disposal
9.14	School fund - Invoices			Current year + 6 years	Secure disposal
9.15	School fund - Receipts			Current year + 6 years	Secure disposal
9.16	School fund - Bank statements			Current year + 6 years	Secure disposal
9.17	School fund - School journey books			Current year + 6 years	Secure disposal
9.18	Student grant applications	Yes		Current year + 3 years	Secure disposal
9.19	Free school meals registers	Yes		Current year + 6 years	Secure disposal
9.20	Petty cash books			Current year + 6 years	Secure disposal

10. Records relating to property

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
10.1	Title deeds			Permanent	These should follow the property
10.2	Plans			Permanent	Retain in school whilst operational. Can then be archived/stored elsewhere.
10.3	Maintenance and contractors		Financial Regulations	Current year + 6 years	Secure disposal
10.4	Leases			Expiry of lease + 6 years	Secure disposal
10.5	Lettings			Current year + 3 years	Secure disposal
10.6	Burglary, theft and vandalism report forms			Current year + 6 years	Secure disposal
10.7	Maintenance log books			Last entry + 10 years	Secure disposal
10.8	Contractors' reports			Current year + 6 years	Secure disposal

11. Records relating to local authorities

Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
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11.1	Secondary transfer sheets (primary)	Yes		Current year + 2 years	Secure disposal
11.2	Attendance returns	Yes		Current year + 1 year	Secure disposal
11.3	Circulars from Local Authority (LA)	Yes		Whilst required operationally	Review to see if further retention period required. Disposal

12. Records relating to the Department for Education (DfE)

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
12.1	HMI reports			These do not need to be kept any longer	Secure disposal
12.2	OFSTED reports and papers			Replace former report with new inspection report	Review to see if further retention period required. Secure disposal
12.3	Returns			Current year + 6 years	Secure disposal
12.4	Circulars from Department for Education (DfE)			Whilst required operationally	Review to see if further retention period required. Disposal

14. Records relating to school meals

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
14.1	Dinner register			Current year + 3 years	Secure disposal
14.2	School meals summary sheets			Current year + 3 years	Secure disposal

15. Records relating to Family Liaison Officers and Home School Liaison Assistants

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
15.1	Day books	Yes		Current year + 2 years	Review to see if further retention period required. Secure disposal
15.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Whilst the child is attending the school	Secure disposal
15.3	Referral forms	Yes		While the referral is current	Secure disposal
15.4	Contact data sheets	Yes		Current year then review	If contact is no longer active secure disposal
15.5	Contact database entries	Yes		Current year then review	If contact is no longer active secure delete
15.6	Group registers	Yes		Current year + 2 years	Secure disposal

16. Data Processing

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
16.1	Subject Access Requests	Yes		Closure +3 years	Review to see if further retention period required. Secure disposal
16.2	Data Breach Investigations	Yes		Closure + 6 years	Secure disposal
16.3	Data Protection Impact Assessments (DPIAs)	Yes		Life of processing activity + 6 years	Secure disposal
16.4	Records of Processing Activities (ROPA)	Yes		Current version plus superseded versions for 6 years	Secure disposal
16.5	Routine CCTV Footage	Yes		30-31 days	Secure disposal
16.6	CCTV required for Investigation	Yes		Until case closed + 6 years	Secure disposal