

Achieving together in faith

Holy Cross Catholic MAC

Data Retention Policy 2023 – 2024

Responsible for Policy	Chris Connoll
Resources Committee Approval Date	18 October 2023
Posted on Website	19 October 2023
Sent out to Schools	19 October 2023
Date of Policy Review	October 2024

Document Control:

Version History

Version	Status	Date	Author	Department	Summary of Changes
1.0	Draft	08/2023	C Connoll	HCCMAC, Central Team	Creation of Policy from template.
		18/10/2023		MAC Resources Committee	For Approval
1.1	Draft	18/10/2023	Resources Committee		Changes to 3.3.10 and 3.3.11 to Current year plus 6 years.
1.1	Approved	18/10/2023		MAC Resources Committee	Approved
1.2		19/10/2023	C Connoll	HCCMAC, Central Team	Minor amendment: 2.1.4 - Copy of DBS Certificate to only be kept for a maximum of six months (if required)
1.3		19/12/2023	C Connoll	HCCMAC, Central Team	Minor amendment: 3.3.12 – was 6 months, corrected to 28 days.

1. Aims

Holy Cross Catholic MAC aims to ensure that all personal data collected about staff, pupils, parents, directors, Local Governing Body members, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018).

This policy applies to all personal data, regardless of whether it is in paper or electronic format.

2. Legislation and guidance

This policy meets the requirements of the GDPR and the provisions of the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the GDPR and the ICO's code of practice for subject access requests.

It also reflects the ICO's code of practice for the use of surveillance cameras and personal information. In addition, this policy complies with our funding agreement and articles of association.

3. Scope

This policy applies to all records created, received or maintained by permanent and temporary staff of the school and pupils 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 documents which facilitate the business carried out by the school and which are thereafter retained to provide evidence of transactions or activities. These records may be created, received or maintained in hard copy or electrical format e.g. paper documents, scanned documents, emails, audio and video recordings, text messages, notes of telephone and spreadsheets, Word Documents, presentations, etc.

4. Responsibilities

MAC Board of Directors

The MAC Board of Directors has a statutory responsibility to maintain the MAC's records and record-keeping systems in accordance with the regulatory framework of the school.

MAC Data Controller

The Data Controller for the Holy Cross Catholic MAC will ensure compliance of all data protection policies across the organisation and report to the MAC Board of Directors.

School Headteacher

School Headteachers should ensure that all staff receive training on data protection policies. Headteachers should be working together with Data Champions to ensure compliance.

The Data Champions in schools

School Data Protection Leads will provide guidance on good records management practices within the school and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. The Data

Champion will monitor compliance with this policy by ensuring that the 'Annual Review of School Records Checklist' is completed at least annually.

Further advice can be sourced from MAC's Data Protection Officer or the MAC's Data Controller:

DPO - Data Controller

Holy Cross Catholic MAC

Heathcote Street

School Data Protection Officer

Warwickshire Legal Services

Shire Hall

CV6 3BL CV34 4RL

Email: DPO@hcmac.co.uk Email: schooldpo@warwickshire.gov.uk

Tel: 02475 186 555 Tel: 01926 476973

5. Safe Destruction of Records

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

- Paper records should be disposed of using confidential waste bins
- CDs/DVDs should be cut into pieces
- Hard Disks should be dismantled or destroyed

Any other records will be bundled up and disposed of using the confidential waste bins as above Do not put records containing personal information with the regular waste bins or skips.

6. 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, we will ensure that our school complies with the Data Protection rules and the Freedom of Information Act 2000.

7. Links to other policies

This Records Management policy is linked to our:

- MAC Data Protection Policy
- MAC Freedom of Information Policy
- MAC Information Security Policy
- MAC Staff Code of Conduct

Please see IRMS Toolkit for further information - https://irms.org.uk

Data Protection Schedule

1. Go	overnance, Funding and Financial Management of (MAC)	6
1.1	Governance of the Academy Trust	6
1.2	Board of Directors, Members Meetings and Governing Body	9
1.3	Funding and Finance	14
1.4	Policies, Frameworks and Overarching Requirements	23
2. Hu	ıman Resources	24
2.1	Recruitment	24
2.2	Operational Staff Management	28
2.3	Management of Disciplinary and Grievance Processes	29
2.4	Health and Safety	30
3. Ma	anagement of the Academy	33
3.1	Admissions	33
3.2	Head Teacher and Senior Management Team	36
3.3	Operational Administration	37
4. Pr	operty Management	39
4.1	Property Management	39
4.2	Maintenance	40
4.3	Fleet Management	40
5. Pu	ipil Management	42
5.1	Pupil's Educational Record	42
5.2	Attendance	47
5.3	Special Educational Needs	48
6. Cu	ırriculum Management	50
6.1	Statistics and Management Information	50
6.2	Implementation of Curriculum	52
7. Ex	tracurricular Activities	54
7.1	Educational Visits outside the Classroom	54
7.2	Walking Bus	57
8.1	Local Authority	57
8.2	Central Government	58

1. Governance, Funding and Financial Management of (MAC)

1.1 Gov	ernance of the Academy Trust				
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
1.1.1	Governance Statement	No		Life of governance statement + 6 years	SECURE DISPOSAL
1.1.2	Articles of Association	No		Life of the Academy	
1.1.3	Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL
1.1.4	Memorandum of Understanding of Shared Governance among Schools	No	Companies Act 2006 section 355	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL
1.1.5	Constitution	No		Life of the Academy	
1.1.6	Special Resolutions to amend the Constitution	No		Life of the Academy	
1.1.7	Written Scheme of Delegation	No	Companies Act 2006 section 355	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL
1.1.8	Directors – Appointment	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.9	Directors – Disqualification	No	Company Directors Disqualification Act 1986	Date of disqualification + 15 years	SECURE DISPOSAL

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
1.1.10	Directors – Termination of Office	No		Date of termination + 6 years	SECURE DISPOSAL
1.1.11	Annual Report – Trustees Report	No	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL
1.1.12	Annual Report and Accounts	No	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL
1.1.13	Annual Return	No	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL
1.1.14	Appointment of Trustees and Governors and Directors	Yes		Life of appointment + 6 years	SECURE DISPOSAL
1.1.15	Statement of Trustees Responsibilities	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.16	Appointment and removal of Members	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.17	Strategic Review	No		Date of the review + 6 years	SECURE DISPOSAL
1.1.18	Strategic Plan [also known as School Development Plans]	No		Life of plan + 6 years	SECURE DISPOSAL
1.1.19	Accessibility Plan	There may be if the plan refers to specific pupils	Limitation Act 1980 (Section 2)	Life of plan + 6 years	SECURE DISPOSAL

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
	Board of Directors				
1.2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.2	Board Decisions	Could be if the decisions refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.3	Board Meeting: Annual Schedule of Business	No		Current year	SECURE DISPOSAL
1.2.4	Board Meeting: Procedures for conduct of meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	SECURE DISPOSAL
	Committees ¹				
1.2.5	Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES

¹ The board can establish any committee and determine the constitution, membership and proceedings that will apply.

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
1.2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting ²	OFFER TO ARCHIVES
1.2.7	Records relating to the management of the Annual General Meeting ³	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting ⁴	OFFER TO ARCHIVES
	Governors				
1.2.8	Agendas for Governing Body meetings	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL ⁵

² The signed minutes must be kept securely together with the notice and agenda for the meeting and supporting documentation provided for consideration at the meeting. Documentation is generally filed in a dedicated minute book, which is usually in the form of a loose-leaf binder to which additional pages can be easily added.

³ Not all Academies are required to hold an Annual General Meeting for the Members – the requirement will be stated in the Constitution.

⁴ The signed minutes must be kept securely together with the notice and agenda for the meeting and any supporting documentation provided for consideration at the meeting. Documentation is generally filed in a dedicated minute book, which is usually in the form of a loose-leaf binder to which additional pages can be easily added.

⁵ In this context, SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross-cut shredder.

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
1.2.9	Minutes of, and papers considered at, meetings of the Governing Body and its committees	May be data protection issues, if the meeting is dealing with confidential issues relating to staff			
	Principal Set (signed)			Life of Academy	
	Inspection Copies ⁶			Date of meeting + 3 years	SECURE DISPOSAL
1.2.10	Reports presented to the Governing Body	May be data protection issues, if the report deals with 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 for the life of the Academy	SECURE DISPOSAL or retain with the signed set of minutes
1.2.11	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

⁶ These are the copies which the clerk to the Governor may wish to retain, so that requestors can view all the relevant information, without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
1.2.12	Trusts and Endowments managed by the Governing Body	No		PERMANENT	
1.2.13	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
1.2.14	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

⁷ Academies are required by law to keep specific records, collectively known as statutory registers or the statutory books. The registers record information relating to the Academy's operations and structure, such as the current directors. Records should be kept up-to-date to reflect any changes that take place.

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
1.2.15	Register of Directors		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.16	Register of Directors' interests [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.17	Register of Directors' residential addresses		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.18	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.19	Register of members		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.20	Register of secretaries		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.21	Register of Trustees interests			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.22	Declaration of Interests Statements [Governors] [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL

1.3 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
	Strategic Finance				
1.3.1	Statement of financial activities for the year	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.2	Financial planning	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.3	Value for money statement	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.4	Records relating to the management of VAT	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.5	Whole of government accounts returns	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.6	Borrowing powers	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.7	Budget plan	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.8	Charging and remissions policy	No		Date policy superseded + 3 years	SECURE DISPOSAL
	Audit Arrangements				
1.3.9	Audit Committee and appointment of responsible officers	No		Life of the Academy	SECURE DISPOSAL

1.3	Funding :	and Finance
-----	-----------	-------------

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
1.3.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	SECURE DISPOSAL
1.3.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	SECURE DISPOSAL
	Funding Agreements				
1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements8	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.13	Funding Agreement – Termination of the funding agreement ⁹			Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.14	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	SECURE DISPOSAL

⁸ Where there is multi-Academy governance.
⁹ Either party may give not less than 7 financial years' written notice to terminate the Agreement, such notice to expire on 31 August. Or, where the Academy has significant financial issues or is insolvent, the Agreement can be terminated by the Secretary of State to take effect on the date of the notice.

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end o
1.3.15	Funding Records – Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.16	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
.3.17	Per pupil funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
.3.18	Exclusions agreement ¹⁰	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.19	Funding records ¹¹	No		+ 6 years Date of last	SECURE

No

1.3.20

Gift Aid and Tax Relief

DISPOSAL

SECURE

DISPOSAL

payment of funding

payment of funding

+ 6 years

+ 6 years

Date of last

¹⁰ The Academy can enter into an arrangement with a Local Authority (LA), so that payment will flow between the Academy and the LA, in the same way as it would do were the Academy a maintained school.

¹¹ Funding agreement which says that the Academy can receive donations and can only charge where the law allows maintained schools to charge [see Charging and Remission Policy].

1.3 **Funding and Finance** Basic file description Statutory **Data Protection Retention Period** Action at the end of **Provisions** Issues life SECURE 1.3.21 Date of last Records relating to loans No DISPOSAL payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000 **Payroll and Pensions** 1.3.22 Current year + 3 SECURE Maternity pay records Yes Statutory Maternity Pay DISPOSAL years (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567) 1.3.23 Records held under Yes Regulation 15 SECURE From the end of the **Retirement Benefits** Retirement year in which the DISPOSAL **Benefits** Schemes (Information accounts were Powers) Regulations 1995 signed for a Schemes (Information minimum of 6 years Powers) Regulations 1995 (SI 1995/3103)

1.3 **Funding and Finance** Basic file description **Data Protection** Statutory **Retention Period** Action at the end of Issues **Provisions** life Management of the Date of last SECURE 1.3.24 Yes Teachers' Pension Scheme DISPOSAL payment on the pension + 6 years 1.3.25 Yes Date of last SECURE Records relating to pension payment on the DISPOSAL registrations pension + 6 years 1.3.26 Payroll records Yes Date payroll run + 6 SECURE DISPOSAL years **Risk Management and Insurance** SECURE 1.3.27 Insurance policies No Date the policy DISPOSAL expires + 6 years 1.3.28 Records relating to the No Date claim settled + SECURE settlement of insurance DISPOSAL 6 years claims 1.3.29 Employer's Liability No Closure of the SECURE Insurance Certificate school + 40 years DISPOSAL **Endowment Funds and Investments** Life of the SECURE 1.3.30 Investment policies No investment + 6 DISPOSAL years 1.3.31 Management of Endowment Life of the fund + 6 No Funds years

1.3 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
	Accounts and Statements				
1.3.32	Annual accounts	No		Current year + 6 years	STANDARD DISPOSAL
1.3.33	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
1.3.34	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.35	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
1.3.36	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.37	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.38	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL

1.3 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
	Contract Management				
1.3.39	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
1.3.40	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
1.3.41	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL
	Asset Management				
1.3.42	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
1.3.43	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL
1.3.44	Records relating to the leasing of shared facilities, such as sports centres	No		Current year + 6 years	SECURE DISPOSAL
1.3.45	Land and building valuations	No		Date valuation superseded + 6 years	SECURE DISPOSAL
1.3.46	Disposal of assets	No		Date asset disposed of + 6 years	SECURE DISPOSAL

1.3 **Funding and Finance** Basic file description **Data Protection** Statutory **Retention Period** Action at the end of Issues **Provisions** life SECURE 1.3.47 Community School leases No Date lease expires DISPOSAL for land +6 years Commercial transfer SECURE 1.3.48 No Date of transfer + 6 arrangements years DISPOSAL 1.3.49 Transfer of land to the No Life of land SECURE **Academy Trust** DISPOSAL ownership then transfer to new owner 1.3.50 Transfers of freehold land SECURE No Life of land DISPOSAL ownership then transfer to new owner **School Fund** SECURE 1.3.51 School Fund - Cheque Current year + 6 No DISPOSAL books years 1.3.52 No SECURE School Fund - Paying in Current year + 6 DISPOSAL books years 1.3.53 SECURE School Fund – Ledger No Current year + 6 DISPOSAL years 1.3.54 School Fund - Invoices No Current year + 6 SECURE DISPOSAL years SECURE School Fund – Receipts No Current year + 6 1.3.55 DISPOSAL years

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end o
.3.56	School Fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL
.3.57	School Fund – Journey books	No		Current year + 6 years	SECURE DISPOSAL
	School Meals ¹²				
.3.58	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
.3.59	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL

As a charity, an Academy is not permitted to trade and make a profit. It is, however, possible to set up a subsidiary trading company, which can sell products or services and Gift Aid profits back to the Academy. If the Academy operates a subsidiary company, it is expected that these records will be managed in line with standard business practice.

¹² Unless it would be unreasonable to do so, school lunches should be provided when they are requested by, or on behalf of, any pupil. A school lunch must be provided free of charge to any pupil entitled to free school lunches. From September 2014, free school lunches must be provided to all KS1 pupils.

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
1.4.1	Data Protection Policy, including data protection notification	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.2	Freedom of Information Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.3	Information Security Breach Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.4	Special Educational Needs Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.5	Complaints Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.6	Risk and Control Framework	No		Life of framework + 6 years	SECURE DISPOSAL
1.4.7	Rules and Bylaws	No		Date rules or bylaws superseded + 6 years	SECURE DISPOSAL
1.4.9	Home School Agreements ¹³	No		Date agreement revised + 6 years	SECURE DISPOSAL
1.4.10	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	SECURE DISPOSAL

¹³ This should be drawn up in consultation with parents and should apply to all pupils.

2. Human Resources

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
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 relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL

_

¹⁴ Academies do not necessarily have to employ people with qualified teacher status; only the SEN and designated LAC teacher must be qualified.

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
2.1.4	Pre-employment vetting information – DBS Checks ¹⁵	No	DBS Update Service Employer Guide June 2014	The code of practice requires that the information revealed is considered only for the purpose for which it was obtained, and should be destroyed after a suitable period has passed - usually no longer than six months.	SECURE DISPOSAL
2.1.5	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 added to the Staff Personal File	SECURE DISPOSAL

 $^{^{15}}$ Academies are bound by the legislation that applies to independent schools NOT maintained schools.

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ¹⁶	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, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.7	Records relating to the employment of overseas teachers	Yes		Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.8	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL

 $^{^{16}}$ Employers are required to take a "clear copy" of the documents which they are shown as part of this process.

2.2 Operational Staff Management Basic file description **Data Protection Issues Statutory Provisions Retention Period** Action at the end of life 2.2.1 Staff Personal File, including Yes Limitation Act Termination of SECURE DISPOSAL employment contract and staff 1980 (Section 2) employment + 6 years training records 2.2.2 Yes SECURE DISPOSAL Timesheets Current year + 6 years 2.2.3 Yes Current year + 5 years SECURE DISPOSAL Annual appraisal/assessment records 2.2.4 Records relating to the No Date pay and conditions SECURE DISPOSAL agreement of pay and superseded + 6 years conditions Training needs analysis 2.2.5 No Current year + 1 year SECURE DISPOSAL

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded ¹⁷	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to interagency 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 longer, then REVIEW	SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			
	Oral warning			Date of warning ¹⁸ + 6 months	SECURE DISPOSAL ¹⁹
	Written warning – level 1			Date of warning + 6 months	SECURE DISPOSAL ²⁰

_

¹⁷ This review took place when the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention.

¹⁸ Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice.

¹⁹ If warnings are placed on personal files, then they must be weeded from the file.

²⁰ If warnings are placed on personal files, then they must be weeded from the file.

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
Written warning – level2			Date of warning + 12 months	SECURE DISPOSAL ²
Final warning			Date of warning + 18 months	SECURE DISPOSAL
Case not found			If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL

2.4 H	2.4 Health and Safety								
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life				
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				

²¹ If warnings are placed on personal files, then they must be weeded from the file.²² If warnings are placed on personal files, then they must be weeded from the file.

2.4 Health and Safety						
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life	
2.4.3	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	
2.4.4	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below		
	Adults			Date of incident + 6 years	SECURE DISPOSAL	
	Children			Date of birth of the child + 25 years	SECURE DISPOSAL	
2.4.5	Control of Substances Hazardous to Health (COSHH)	No		Current year + 10 years then REVIEW	SECURE DISPOSAL	

2.4 Health and Safety Basic file description Action at the end of life **Statutory Provisions Data Protection Issues Retention Period** 2.4.6 Process of monitoring of areas where No Last action + 40 years SECURE DISPOSAL employees and persons are likely to have come into contact with asbestos Last action + 50 years Process of monitoring of areas where SECURE DISPOSAL 2.4.7 No employees and persons are likely to have come into contact with radiation SECURE DISPOSAL 2.4.8 Fire precautions log books No Current year + 6 years Life of the risk 2.4.9 Fire risk assessments Fire Service Order SECURE DISPOSAL No 2005 assessment + 6 years 2.4.10 Incident reports Yes Current year + 20 years SECURE DISPOSAL

3. Management of the Academy

Admissions Basic file description Data Protection Issues Statutory Provisions Retention Period Action at the end of life 3.1.1 All records relating to the creation and No School Admissions Life of the policy + 3 SECURE DISPOSAL implementation of the School Code years then REVIEW Admissions' Policy Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014 3.1.2 Admissions – if the admission is Yes School Admissions Date of admission + 1 SECURE DISPOSAL successful Code year Statutory Guidance for admission authorities. governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
3.1.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
3.1.4	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 3 years after the date on which the entry was made ²³	REVIEW Schools may wish to consider keeping the admission register permanently, as often schools receive enquiries from past pupils to confirm the dates they attended the school
3.1.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSA

²³ School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014 p6.

3.1 Admissions

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life		
3.1.6	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		
3.1.7	Supplementary information form, including additional information such as religion and medical conditions	Yes					
	For successful admissions			This information should be added to the pupil file	SECURE DISPOSAL		
	For unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL		

3.2 H	3.2 Head Teacher and Senior Management Team						
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life		
3.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then REVIEW	These could be of permanent historical value and should be offered to the County Archives Service, if appropriate		
3.2.2	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL		
3.2.3	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		
3.2.4	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		
3.2.5	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		

3.2 H	3.2 Head Teacher and Senior Management Team							
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life			
3.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL			

3.3 C	3.3 Operational Administration							
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life			
3.3.1	Management of complaints	Yes		Date complaint resolved + 3 years	SECURE DISPOSAL			
3.3.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	SECURE DISPOSAL			
3.3.3	Records relating to the management of software licences	No		Date licence expires + 6 years	SECURE DISPOSAL			
3.3.4	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL			
3.3.5	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL			
3.3.6	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL			
3.3.7	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL			
3.3.8	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL			

3.3 C	perational Administration	Data Bastastian Issues	Ctatutama Bassisiana	Detection Desired	Anthon of the and of life
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
3.3.9	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
3.3.10	Electronic communications – Emails, internal to internal	May be data protection issues relating to staff, student, and parent data		Current Year + 6 years	SECURE DISPOSAL
3.3.11	Electronic communications – Emails, External to internal or Internal to External	May be data protection issues relating to staff, student, and parent data		Current Year + 6 years	SECURE DISPOSAL
3.3.12	Electronic communications – TEAMS chats	May be data protection issues relating to staff, student, and parent data		28 days	SECURE DISPOSAL
3.3.13	Electronic communications – Telephone audio recordings	May be data protection issues relating to staff, student, and parent data		Current day + 7 days	SECURE DISPOSAL

4. Property Management

This section covers the management of buildings and property.

4.1 P	1.1 Property Management								
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life				
4.1.1	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry					
4.1.2	Plans of property belonging 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 F	Property Management				
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
4.1.5	Business continuity and disaster recovery plans	No		Date the plan superseded + 3 years	SECURE DISPOSAL

4.2 N	2 Maintenance							
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life			
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			

4.3 F	leet Management				
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL

4.3 Fleet Management Basic file description Action at the end of life **Statutory Provisions Retention Period Data Protection Issues** 4.3.2 The process of managing allocation Limitation Act 1980 Disposal of the vehicle SECURE DISPOSAL (Section 2) and maintenance of vehicles, e.g., + 6 years lists of who was driving the vehicles and when, maintenance SECURE DISPOSAL Service logs and vehicle logs Life of the vehicle, then 4.3.3 Ν Limitation Act 1980 either to be retained for (Section 2) 6 years by school or to be returned to lease company 4.3.4 GPS tracking data relating to the Ν Limitation Act 1980 Date of journey + 6 SECURE DISPOSAL vehicles (Section 2) years

5. Pupil Management

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

5.1	1 Pupil's Educational Record							
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life			
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 No. 1437					
	• Primary			Retain whilst the child remains at the primary school	The file should follow the pupil when they leave the primary school. This will include: 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 LA to be retained for the			

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end o	
				statutory retention	
				period.	
				If the pupil transf	
				an independent	
				school, transfers	
				home schooling	
				leaves the count	
				file should be ret	
				to the LA to be	
				retained for the	
				statutory retention	
				period. Primary	
				schools do not	
				ordinarily have	
				sufficient storage	
				space to store re	
				for pupils who ha	
				not transferred in	
				normal way. It m	
				more sense to tr	
				the record to the	
				as it is more like	
				the pupil will req	
				the record from	
Secondary		Limitation Act 1980	Date of birth of the	SECURE DISPO	

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	SECURE DISPOSA
1.3	Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be retained	
1.4	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 I	1 Pupil's Educational Record								
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life				
5.1.5	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 interagency 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	Pupil's Educational Record Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
5.1.6	Child protection information held in separate files	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to interagency working to safeguard and promote the welfare of children March 2015"	Date of birth 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 LA Social Services record	SECURE DISPOSAL – these records MUST be shredded

Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule.

5.2 A	5.2 Attendance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life	
5.2.1	Attendance registers	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	SECURE DISPOSAL	
5.2.2	Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL	

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	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 in order 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 – this should be documented

5.3 Special Educational Needs Basic file description **Statutory Provisions Data Protection Issues Retention Period** Action at the end of life 5.3.2 Statement maintained under section Date of birth of the SECURE DISPOSAL. Yes Education Act 1996 234 of the Education Act 1990 and unless the document pupil + 25 years [This **Special Educational** would normally be any amendments made to the is subject to a legal Needs and retained on the pupil hold statement Disability Act 2001 file] Section 1 Advice and information provided to Date of birth of the SECURE DISPOSAL, 5.3.3 Yes **Special Educational** Needs and pupil + 25 years [This unless the document parents regarding educational needs Disability Act 2001 would normally be is subject to a legal Section 2 retained on the pupil hold file] SECURE DISPOSAL, Date of birth of the 5.3.4 Accessibility strategy Yes **Special Educational** pupil + 25 years [This Needs and unless the document Disability Act 2001 would normally be is subject to a legal Section 14 retained on the pupil hold file]

6. Curriculum Management

6.1 S	6.1 Statistics and Management Information					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life	
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 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 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 Statistics and Management Information Basic file description **Data Protection Issues Statutory Provisions Retention Period** Action at the end of life Published Admission Number SECURE DISPOSAL 6.1.3 Yes Current year + 6 years (PAN) reports SECURE DISPOSAL 6.1.4 Value added and contextual data Current year + 6 years Yes 6.1.5 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 life
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	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.3	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 further retention period, or, SECURE DISPOSAL

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
6.2.4	Mark books	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
6.2.5	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 further retention period, or, SECURE DISPOSAL
6.2.6	Pupils' work	No		Where possible, 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. Extracurricular Activities

7.1	7.1 Educational Visits outside the Classroom						
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life		
7.1.1	Records created by schools in order 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 Section 4 – "Good Practice".	Date of visit + 14 years	SECURE DISPOSAL		
7.1.2	Records created by schools in order 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 Section 4 – "Good Practice".	Date of visit + 10 years	SECURE DISPOSAL		

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
7.1.3	Parental consent forms for school trips where there has been no major incident ²⁴	Yes		Conclusion of the trip	Although the conser forms could be retained for date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consen form issued by the school for this period of time

²⁴ One-off or blanket consent: The Department for Education (DfE) has prepared a one-off consent form to be signed by the parent on enrolment of their child in a school. This form is intended to cover all types of visits and activities where parental consent is required. The form is available on the DfE website for establishments to adopt and adapt, as appropriate, at www.gov.uk/government/publications/consent-for-school-trips-and-other-off-site-activities. A similar form could be used for other establishments, such as Early Years Foundation Stage (EYFS) providers and youth groups, or at the start of programmes for young people.

7.1 Educational Visits outside the Classroom Basic file description Data Protection Issues **Statutory Provisions** Action at the end of life **Retention Period** 7.1.4 Parental permission slips for school Limitation Act 1980 Date of birth of the Yes trips - where there has been a (Section 2) pupil involved in the major incident 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 7.1.5 Records relating to residential trips Yes Date of birth of SECURE DISPOSAL youngest pupil involved + 25 years

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life
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 back up copies should be destroyed at the same time]

8. Central Government and Local Authority (LA)

This section covers records created in the course of interaction between the school and the LA.

8.1	8.1 Local Authority					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life	
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	

8.2	3.2 Central Government					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of life	
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	