



## DATA RETENTION POLICY

The main aim of this policy is to enable The Willow Learning Trust to manage our records effectively and in compliance with data protection and other regulations. The Willow Learning Trust is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned. Maintaining good records helps us to provide the evidence needed to protect the legal rights and interests of our Trust/schools and for us to demonstrate our performance and accountability.

As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.

### 1. Legal framework

This policy has due regard to legislation including, but not limited to, the following:

- General Data Protection Regulation (2018);
- Freedom of Information Act 2000;
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980).

This policy also has due regard to the following guidance:

- Information Records Management Society 'Information Management Toolkit for Schools' 2018.

This policy will be implemented in accordance with the following WLT policies and procedures:

- Data Protection Policy;
- Freedom of Information Policy;
- Data Security Policy

### 2. Responsibilities

The Trust has a statutory responsibility to maintain the Trust/School's records and record keeping in accordance with the regulatory framework of the school.

The CEO and Trustees hold overall responsibility for this policy and the Executive Headteacher (primaries) and Headteachers of WLT schools are responsible for ensuring it is implemented correctly within their schools.

The data protection officer (DPO) is responsible for

- promoting compliance with this policy;
- ensuring that all staff are aware of the importance of storing records securely and disposing records correctly, in accordance with the retention periods outlined in this policy;
- Reviewing the policy on a biennial basis

All staff members are responsible for ensuring that any records for which they are responsible are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

### **3. Management of records**

Records are defined as all documents which facilitate the business carried out by the Trust/its schools 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, e-mails, audio and video recordings, spreadsheets, Word Documents, presentations, etc.

Pupil records are specific documents that are used throughout a pupil's time in the education system. They are passed to each school that a pupil attends and include all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.

The following information is stored on the front of a pupil record, and will be easily accessible:

- Forename, surname, unique pupil number.

The following lists common and potential record types that form part of the Pupil Record:

- Admissions Form
- Details of any SEND
- Pupil welfare details such as registered disabilities and any other agency involvement, e.g. speech and language therapist;
- School history including attendance details and record of transfer;
- Parental or pupil consents;
- National curriculum and agreed syllabus record sheets;
- Any information relating to exclusions;
- Notes relating to major incidents involving the pupil;
- Any information about an education and healthcare (EHC) plan and support offered in relation to the EHC plan
- Any information relating to exclusions
- Any correspondence with parents or external agencies relating to major issues, e.g. mental health;

The following information is subject to shorter retention periods and, therefore, will be stored separately:

- Attendance Registers and information;
- Absence notes and supporting medical documents;
- Parental and, where appropriate, pupil consent forms and healthcare plans for educational visits.
- Correspondence with parents about minor issues, e.g. behaviour.

Hard copies of disclosures and reports relating to child protection are stored in a securely locked filing cabinet in the designated safeguarding lead's (DSL) office. Electronic records are stored using child protection software and can only be accessed by the safeguarding team and Headteachers.

Hard copies of complaints made by parents or pupils are scanned and stored electronically or kept securely in a locked filing cabinet.

Actual copies of accident and incident information are stored separately on the WLT's management information system and held in line with the retention periods outlined in this policy. An additional copy may be placed in the pupil's file in the event of a major accident or incident.

Any information relating to an education and healthcare plan (EHCP) and further SEND details may be stored in an additional pupil file within the SEN base or SENCo office.

The WLT will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend. The only exception is if any records placed on the pupil's file

have a shorter retention period and may need to be removed (e.g. consent for educational visits). If any pupil attends the school until statutory school leaving age, the school will keep the pupil's records until the pupil reaches the age of 25 years.

Electronic records relating to a pupil's record will be transferred to the pupils' next school using the DfE's secure access School to School system.

The WLT will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the WLT.

**Primary Schools:** The schools will not keep any copies of information stored within a pupil's record, unless there is ongoing legal action at the time during which the pupil leaves the school. The responsibility for these records will then transfer to the next school that the pupil attends.

For information, Appendix A sets out legal requirements for certain categories of document. The tables in Appendix B and C set out the main categories of information that we hold, the length of time that we intend to hold them, and the method of disposal.

#### **4. Accessing information**

The WLT is transparent with data subjects about the information we hold and how it can be accessed. All members of staff, pupils, parents of registered pupils and other users of the WLT and its facilities have the right, under the GDPR, to access certain personal data being held about them or their child. Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents. Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

The WLT will adhere to the provisions outlined in the WLT's GDPR Data Protection Policy when responding to requests seeking access to personal information (subject access requests).

#### **5. Disposal of data**

Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.

Where disposal of information is outlined as secure disposal, this will be shredded or pulped and electronic information will be scrubbed clean and, where possible, cut. The WLT network manager (TNM) will keep a record of all files that have been destroyed.

Where the disposal action is indicated as reviewed before it is disposed, the DPO will review the information against its administrative value. If the information should be kept for administrative value, the DPO will keep a record of this. If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

Where information has been kept for administrative purposes, the DPO will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.

#### **6. Digital continuity statement**

Data that is retained for longer than six years will be archived to dedicated files on the WLT's server, which are password-protected. This will be backed-up in accordance with our Data Security Policy.

## **7. Monitoring and review**

This policy will be reviewed every 2 years by the DPO in conjunction with the Trust Premises committee and the TNM. The next scheduled review date for this policy is **July 2023**.

Any changes made to this policy will be communicated to all members of staff.

## APPENDIX A

DOCUMENT TYPE	RETENTION PERIOD	REASON
<b>Company Records</b>		
Academy funding agreement and any supplemental agreements	Permanent	Companies Act 2006 Charities Act 2011
Company Articles of Association, Rules / bylaws	Permanent	Charities Act 2011
Trustee / director minutes of meetings and written resolutions	Recommended at least 10 years	Companies Act 2006 Charities Act 2011
Members' meetings etc. Minutes / resolutions	Recommended at least 10 years	Companies Act 2006 Charities Act 2011
Documents of clear historical / archival significance	Permanent if relevant data protection provisions are met.	Data Protection Regulation
Contracts e.g. with supplies or grant makers	Length of contract term plus 6 years	Limitation Act 1980
Contracts executed as deeds	Length of contract term plus 12 years	Limitation Act 1980
IP records and legal files re provision of service	Recommended: Life of service provision or IP plus 6 years	Limitation Act 1980
<b>Tax And Finance</b>		
Annual accounts and review (including transferred records on amalgamation)	Minimum of 6 years Recommended: permanent record	Companies Act 2006 Charities Act 2011
Tax and accounting records	6 years from end of relevant tax year	Finance Act 1998 Taxes Management Act 1970
Information relevant for VAT purposes	Minimum 5 years from end of relevant period	Finance Act 1998 HMRC Notice 700/21
Banking records / receipts Book / sales ledger	6 years from transaction	Companies Act 2006 Charities Act 2011
<b>Employee Administration</b>		
Payroll / Employee / Income Tax and NI records: P45, P6, P11D, P60 etc	6 years from end of current year	Taxes management Act 1970 IT PAYE regulations
Maternity Pay	3 years after the end of the tax year	Statutory Maternity Pay Regulations
Sick Pay	3 years after the end of the tax year	Statutory Sick Pay (General) Regulations
National Minimum Wage records	3 years after the end of the tax year	National Minimum Wage Act
Foreign national ID documents	Minimum 2 years from end of employment	Immigrations (Restrictions on Employment) Order 2007 Independent School Standards Regulations
HR files and training records	Maximum 6 years from end of employment	Limitation Act 1970 and Data Protection regulation
Records re working time	2 years	Working Time regulations 1998 as amended
Job Applications (CVs and other related materials)	Recommended: 6-12 months	ICO Employment Practices Code (Recruitment & Selection) Disability Discrimination Act 1995 & Race Relations Act 1976

Pre-employment / volunteer vetting	6 months	ICO Employment Practice Code Independent School Standards Regulations
Disclosure and Barring Service checks	Record only result and delete other information. If copy is kept, not to be retained beyond 6 months	Single Central Record Requirements under part 4 of the schedule to the Education (Independent School Standards) Regulations 2014
<b>Insurance</b>		
Employer's liability Insurance	40 years	Employers' liability (Compulsory Insurance Regulation) 1998
Policies	3 years after lapse	Commercial
Claims correspondence	3 years after settlement	Commercial
<b>Health &amp; Safety / Medical</b>		
General Records	Minimum 3 years	Limitation Act 1970
Records re work with hazardous substances	Up to 40 years. Recommend Permanent	Control of hazardous Substances to Health Regulations 2002
Accident books / records and reports	3 years after last entry or end of investigation	Reporting of injuries Diseases and Dangerous Occurrences Regulations 1995
Medical Scheme documentation	Permanent unless personal data is included	Commercial
<b>Premises / Property</b>		
Leases	12 years after lease has expired	Limitation Act 1980
Building records, plans, consents and certification and warranties etc.	6 years after disposal or permanent if of historical archival interest. Carry out review re: longer retention, e.g. if possible actions against contractors	Limitation Act 1980
<b>PUPILS</b>		
Educational Records	25 years from date of birth if this is the final school of the child – pass on to the pupil's new school	Pupil information Regulations 2005 Data Protection regulation
Child Protection Information (on child's file)	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.	Keeping children safe in education Statutory guidance for schools and colleges 2018 Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018
Child Protection Information in other files	DOB of the child +25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record.	Keeping children safe in education Statutory guidance for schools and colleges 2018 Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018
<b>Special Educational Needs</b>		
SEN Files	Usually 25 years from date of birth of the pupil	Limitation Act 1980

Educational Health and Care Plans	25 years from the date of birth of pupil unless passed to new school	Special Educational Needs and Disability Regulations 2014 Children and families Act 2014, part 3
Statements of special Educational Needs (now historic)	25 years from date of birth of pupil unless passed to new school	Originally under Special Educational Needs and Disability Regulations 2001
Attendance Registers	3 years from when the register entry was made if made in paper registers For computerised registers retain until 3 years after the end of the school year during which the entry was made. This applies to every back up copy.	Pupil Registration regulations 2006 Regulation 14
<b>Parents</b>		
	Usually, for the duration that the parent has a pupil at the school. Otherwise subject to case by case justification	Pupils Registration Regulations 2006 for name and contact details

## APPENDIX B

### Retention of pupil records

The table below outlines the WLT's retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Personal identifiers and personal characteristics</b>		
Images used for identification purposes	Whilst the pupil remains at school, then archived with the pupil record	Secure disposal
Images used in displays in schools	In line with the consent period	Secure disposal
Images used for marketing purposes, or other	In line with the consent period	Secure disposal
Biometric data	In line with the consent period, or whilst the pupil remains at school, whichever is less, plus one month	Secure disposal
<b>Admissions</b>		
Register of admissions	Three years after the date on which the entry was made	Information is reviewed and the register may be kept permanently
Trust school admissions	The current academic year, plus one year	Secure disposal
Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	Added to the pupil's record	Secure disposal
Supplementary information submitted, including religious and medical information etc. (where the admission was not successful)	Until the appeals process has been completed	Secure disposal
<b>Pupils' educational records</b>		
Primary Schools' Pupils' Educational Records	Whilst the pupil remains at the school	Transferred to the next destination – if this is an independent school, home-schooling or outside of the

		UK, the file will be kept by the LA and retained for the statutory period
Secondary Pupils' educational records	End of the Academic year 25 years after the pupil's date of birth	Secure disposal
Public examination results	Added to the pupil's record	Returned to the examination board
Internal examination results	Added to the pupil's record	Secure disposal
Behaviour and Golden books	Whilst the pupil remains at the school	Secure disposal
Detention Lists	The current academic year, plus one year	Secure disposal
Child protection information held on a pupil's record	Retain until further recommendations	Secure disposal
Child protection records held in a separate file	Retain until further recommendations	Secure disposal
<b>Attendance</b>		
Attendance registers	Last date of entry on to the register, plus five years	Secure disposal
Letters authorising absence	Current academic year, plus five years	Secure disposal
Letters authorising administering of medicines	To be kept whilst the medicine is given at the school, and longer if there were any issues with the medicine	Secure disposal
<b>SEND</b>		
SEND files, reviews and individual education plans	End of the Academic year 25 years after the pupil's date of birth	Information is reviewed and the file may be kept for longer than necessary if it is required for the school to defend themselves in a

		'failure to provide sufficient education' case
Statement of SEN maintained under section 324 of the Education Act 1996 or an EHC plan maintained under section 37 of the Children and Families Act 2014 (and any amendments to the statement or plan)	End of the Academic year 25 years after the pupil's date of birth	Securely disposed of, unless it is subject to a legal hold
Information and advice provided to parents regarding SEND	End of the Academic year 25 years after the pupil's date of birth	Securely disposed of, unless it is subject to a legal hold
<b>Curriculum management</b>		
SATs results	End of the Academic year 25 years after the pupil's date of birth	Secure disposal
Published Admission Number (PAN) reports	Current academic year, plus three years	Secure disposal
Valued added and contextual data	Current academic year, plus three years	Secure disposal
Self-evaluation forms	Current academic year, plus three years	Secure disposal
Pupils' work	Returned to pupils throughout the year.	Standard Disposal
<b>Extra-curricular activities</b>		
Field file – information taken on school trips Including risk assessments	Until the conclusion of the trip, plus one month  Where a minor incident occurs, field files are added to the core system as appropriate	Secure disposal
Financial information relating to school trips	Whilst the pupil remains at school, plus one year	Secure disposal
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip	Secure disposal
Parental consent forms for school trips where a major incident occurred	End of the Academic year 25 years after the pupil's date of birth (permission slips of all	Secure disposal

	pupils on the trip will also be held to show that the rules had been followed for all pupils)	
Educational visitors in school – sharing of personal information	Until the conclusion of the visit, plus one month	Secure disposal
<b>Family liaison officers and home-school liaison assistants</b>		
Reports for outside agencies	Duration of the pupil's time at school	Secure disposal
Referral forms	Whilst the referral is current	Secure disposal
Contact data sheets	Current academic year	Reviewed and destroyed if no longer active
Contact database entries	Current academic year	Reviewed and destroyed if no longer required
Group registers	Current academic year, plus two years	Secure disposal

## Retention of staff records

The table below outlines the WLT's retention period for staff records and the action that will be taken after the retention period, in line with any requirements.

Type of file	Retention period	Action taken after retention period ends
<b>Operational</b>		
Staff members' personal file	Termination of employment, plus six years	Secure disposal
Timesheets	Current academic year, plus six years	Secure disposal
Annual appraisal and assessment records	Current academic year, plus six years	Secure disposal
<b>Recruitment</b>		
Records relating to the appointment of a new headteacher	Date of appointment, plus six years	Secure disposal
Records relating to the appointment of new members of staff (unsuccessful candidates)	Date of appointment of successful candidate, plus one year	Secure disposal
Records relating to the appointment of new members of staff (successful candidates)	Relevant information added to the member of staff's personal file and other information retained for one year	Secure disposal
Proof of identify as part of the enhanced DBS check	After identity has been proven	Reviewed and a note kept of what was seen and what has been checked – if it is necessary to keep a copy this will be placed on the staff member's personal file, if not, Securely disposed of
Evidence of right to work in the UK	Added to staff personal file or, if kept separately, termination of employment, plus no longer than six years	Secure disposal
Sickness Absence Monitoring	Current year + 3 years	Secure disposal

### Disciplinary and grievance procedures

Child protection allegations, including where the allegation is unproven	Added to staff personal file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer  If allegations are malicious, they are removed from personal files	Secure disposal
Oral warnings	Date of warning, plus six months	Securely disposed of – if placed on staff personal file, removed from file
Written warning – level 1	Date of warning, plus one year	Securely disposed of – if placed on staff personal file, removed from file
Final warning	Date of warning, plus 2 years	Securely disposed of – if placed on staff personal file, removed from file
Records relating to unproven incidents	Conclusion of the case, plus one year, unless the incident is child protection related and is disposed of as above	Secure disposal
<b>CPD</b>		
Staff training except where dealing with children e.g. first aid, safeguarding	Retained on the personnel file	
Staff training where training relates to children	Date of training +40 years	

## Retention of senior leadership and management records

The table below outlines the WLT's retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements.

Type of file	Retention period	Action taken after retention period ends
<b>Trust Records – Meetings</b>		
Meetings schedule	Current year	Standard disposal
Agendas for full Governing body / Full Trust Board meetings	One copy alongside the original set of minutes (permanent) – all others disposed of without retention	Secure disposal
Committee meeting minutes	Ten years	Secure disposal
Original, signed copies of the minutes of the full Governing body / Trustee board meetings	Permanent	If unable to store, these will be provided to the <b>county archives service</b>
Records relating to the management of General Members' Meetings and Annual General Meeting	10 years from the date of the meeting	Secure disposal
Inspection copies of the minutes of Governing board meetings	Date of meeting, plus three years	Shredded if they contain any sensitive and personal information
Register of attendance at FGB / Trust meetings	Date of meeting + 6 years	Secure disposal
Reports presented to the full Governing body / Trustee board	Permanent	Securely disposed of or, if they refer to individual reports, retained with the signed, original copy of minutes
<b>Trust Records – Management</b>		
Instruments of government, including Articles of Association, Memorandum of Association and Funding Agreement	Permanent	If unable to store, these will be provided to the <b>county archives service</b>
Trusts and endowments managed by the governing body	Permanent	Retained in the school whilst it remains open, then provided to the <b>county</b>

		<b>archives service</b> when the school closes
Records relating to the election of parent and staff governors	Date of election + 1 year	Secure Disposal
Records relating to the appointment of Members, Trustees and co-opted governors	Term of Office (provided the decision has been recorded in the minutes)	Secure disposal
Written Scheme of Delegation	Life of written scheme +10 years	Secure disposal
<b>Trust Records – School Management</b>		
Action plans created and administered by the governing body	Three years	Secure disposal
Policy documents created and administered by the governing body	Updated on policy cycle	Secure disposal
Records relating to complaints dealt with by the governing body	Date of the resolution of the complaint, plus a minimum of six years	Reviewed for further retention in case of contentious disputes, then securely disposed of
Annual reports created under the requirements of The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002	Annual report / accounts kept permanently	Secure disposal
Records relating to Governor Monitoring Visits	Date of visit + 3 years	Secure disposal
All records relating to the conversion of schools to Academy status	For life of organisation	Retained in the school whilst it remains open, then provided to the <b>county archives service</b> when the school closes
<b>Trust Records – HR Management</b>		
Register of Directors	Life of the Academy + 6 years	Secure disposal

Register of Directors' residential addresses	Life of the Academy + 6 years	Secure disposal
Register of members	Life of the Academy + 6 years	Secure disposal
Records relating to the terms of office of serving governors/trustees	Date of appointment + 6 years	Secure disposal
Register of business interests	Date of appointment + 6 years	Secure disposal
Governors Code of conduct	Dynamic document signed every year	Secure disposal
Governor/trustee records related to training	Date appointment ceases + 6 years	Secure disposal
Records relating to DBS checks carried out on governors/trustees/members	Details kept on SCR	Secure disposal
Register of gifts, hospitality and entertainment	Life of the academy	Secure disposal
<b>Headteacher and senior leadership team (SLT)</b>		
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus three years	Standard Disposal
Reports created by the headteacher or SLT	Date of the report, plus three years	Standard Disposal
Records created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Current academic year, plus three years	Reviewed and securely disposed of
Correspondence created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Reviewed and securely disposed of
Professional development plan	Held on individual's personnel record. If not, then termination of employment + 6years	Secure Disposal
School development plan	Duration of the plan, plus three years	Standard Disposal

## Retention of health and safety records

The table below outlines the WLT's retention periods for health and safety records, and the action that will be taken after the retention period, in line with any requirements.

Type of file	Retention period	Action taken after retention period ends
<b>Health and safety</b>		
Health and safety policy statements	Duration of policy, plus three years	Secure disposal
Health and safety risk assessments	Duration of risk assessment, plus three years	Secure disposal
Records relating to accidents and injuries at work	Date of incident, plus 12 years. In the case of serious accidents, a retention period of 15 years is applied	Secure disposal
Accident reporting – adults	Date of the incident, plus six years	Secure disposal
Accident reporting – pupils	25 years after the pupil's date of birth, on the pupil's record	Secure disposal
Control of substances hazardous to health	Current academic year, plus 40 years	Secure disposal
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of last action, plus 40 years	Secure disposal
Information relating to areas where employees and persons are likely to come into contact with radiation	Date of last action, plus 50 years	Secure disposal
Fire precautions log books	Current academic year, plus 3 years	Secure disposal

## Retention of financial records

The table below outlines the WLT's retention periods for financial records and the action that will be taken after the retention period, in line with any requirements.

Type of file	Retention period	Action taken after retention period ends
<b>Payroll pensions</b>		
Maternity pay records	Current academic year, plus three years	Secure disposal
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current academic year, plus six years	Secure disposal
Management of the Teachers' Pension Scheme and records relating to pension registration	Date of last payment on the pension + 6 years	Secure disposal
Payroll reports	Current academic year, plus six years	Secure disposal
Pension payroll	Current academic year, plus six years	Secure disposal
Payroll awards	Current academic year, plus six years	Secure disposal
Overtime	Current academic year, plus six years	Secure disposal
Personal bank details	Until superseded, plus 3 years	Secure disposal
Tax Forms	Current academic year, plus six years	Secure disposal
<b>Risk management and insurance</b>		
Employer's liability insurance certificate	Closure of the school, plus 40 years	Secure disposal
<b>Asset management</b>		
Inventories of furniture and equipment	Current academic year, plus six years	Secure disposal
Burglary, theft and vandalism report forms	Current academic year, plus six years	Secure disposal
<b>Accounts and statements including budget management</b>		

Annual accounts	Current academic year, plus six years	Disposed of against common standards
Loans and grants managed by the school	For life of loan plus 6 years	Information is reviewed then securely disposed of
All records relating to the creation and management of budgets	Duration of the budget, plus three years	Secure disposal
Invoices, receipts, order books, requisitions and delivery notices	Current financial year, plus six years	Secure disposal
Records relating to the collection and banking of monies	Current financial year, plus six years	Secure disposal
Records relating to the identification and collection of debt	Current financial year, plus six years	Secure disposal
<b>Contract management</b>		
All records relating to the management of contracts under seal	Life of the contract plus 6 years	Secure disposal
All records relating to the management of contracts under signature	Last payment on the contract, plus six years	Secure disposal
All records relating to the monitoring of contracts	Current academic year, plus two years	Secure disposal
<b>School budget</b>		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Secure disposal
<b>Pupil finance</b>		
Free school meals registers	Current academic year, plus six years	Secure disposal
School meals registers	Current academic year, plus six years	Secure disposal
School meals summary sheets	Current academic year, plus six years	Secure disposal
Pupil premium records	Date pupil leaves the provision + 6 years	Secure disposal

Student grant applications	Current academic year plus 3 years	Secure disposal
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### Retention of other WLT records

The table below outlines the WLT's retention periods for any other records held by the WLT, and the action that will be taken after the retention period, in line with any requirements.

Type of file	Retention period	Action taken after retention period ends
<b>Property management</b>		
Title deeds of properties belonging to the school	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the school	For as long as the building belongs to the school	Transferred to new owners if the building is leased or sold
Leases of property leased by or to the school	Expiry of lease, plus six years	Secure disposal
Records relating to the letting of school premises	Current financial year, plus six years	Secure disposal
<b>Maintenance</b>		
All records relating to the maintenance of the school carried out by contractors	Current academic year, plus six years	Secure disposal
All records relating to the maintenance of the school carried out by school employees	Current academic year, plus six years	Secure disposal
<b>Operational administration</b>		
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year, plus one year	Standard Disposal
Newsletters and other items with short operational use	Current academic year plus three years	Standard disposal
Visitors' books and signing-in sheets	Current academic year, plus six years	Reviewed then securely disposed of

Home school agreements	Non-statutory	Secure Disposal
Records relating to the creation and management of parent-teacher associations and/or old pupil associations	Current academic year, plus six years	Reviewed then securely disposed of
Trust privacy notice	Until superseded + 6 years	Standard disposal
Statutory policies	Date policy superseded + 6 years	Secure disposal
<b>Local Authority</b>		
Attendance Returns	Current year + 1 year	Secure disposal
School census returns	Current year + 5 years	Secure disposal

## APPENDIX C

### Retention of SCITT trainee records and other trainee-related information

Type of file	Retention period	Action taken after retention period ends
<b>Personal identifiers and personal characteristics</b>		
Images used in displays in schools	In line with the consent period	Secure disposal
Images used for marketing purposes, or other	In line with the consent period	Secure disposal
<b>Admissions</b>		
Register of admissions	Five years after the date on which the entry was made	Information is reviewed and the register may be kept permanently
Supplementary information submitted, including medical information etc. (where the admission was successful)	Added to the trainees files	Secure disposal
<b>Attendance</b>		
Attendance registers	Last date of entry on to the register, plus five years	Secure disposal
<b>Curriculum management</b>		
Trainees' work	Returned to trainees throughout the year, until the end of the training year	Standard Disposal
<b>Operational</b>		
Trainee file	End of training	Secure disposal
Assessment records and trainee profiles	Six years	Secure disposal
<b>Recruitment</b>		
Records relating to the recruitment of new trainees (unsuccessful candidates)	Date of appointment of successful candidate, plus one year	Secure disposal

Records relating to the recruitment of new trainees (successful candidates)	Relevant information added to the trainee's file and other information retained for one year	Secure disposal
Proof of identify as part of the enhanced DBS check	After identity has been proven	Reviewed and a note kept of what was seen and what has been checked – if it is necessary to keep a copy this will be placed on the staff member's personal file, if not, Securely disposed of
Evidence of right to work in the UK	Added to staff personal file or, if kept separately, termination of employment, plus no longer than six years	Secure disposal
<b>Disciplinary and grievance procedures</b>		
Child protection allegations, including where the allegation is unproven	Added to trainee file, and until the end of training  If allegations are malicious, they are removed from trainee files	Secure disposal
Oral warnings	Date of warning, plus six months	Securely disposed of – if placed on trainee file, removed from file
Written warning	Until the end of the training year	Securely disposed of – if placed on trainee file, removed from file
Final warning	Until the end of the training year	Securely disposed of – if placed on trainee file, removed from file
Records relating to unproven incidents	Conclusion of the case, and until the end of the training year	Secure disposal
<b>Finance</b>		
Bursary payment and student finance records	Current training year, plus three years	Secure disposal