

Star Primary School



Retention Schedule

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Status: [Approved/Draft]	Approved by Governing Body date:	
Last Updated: Autumn 2020	Next Review: Autumn 2023	Version: 1.0

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Introduction

Star Primary School's Retention Schedule attempts to identify processes which our records support, rather than identifying individual types of records. This is for two reasons:

- To make the retention period apply to all records independent of any format, i.e. the same rules apply to a paper file, an e-mail or another electronic document
- To allow flexibility in developing the schedule to cover new processes and amend existing ones over time.

The Schedule is intended to cover the lifecycle of records and information from creation through to destruction or permanent preservation.

Records intended for destruction under the Schedule may be destroyed in accordance with the provisions of the Schedule. Backup copies stored on alternative media (server/microfilm/paper) should also be destroyed. This is vital to ensure compliance with the requirements of Data Protection law and Freedom of Information legislation.

Records for permanent preservation should be passed to the County's Record Office or other approved place of deposit

Limitation of Scope

Very few types of records have specified time periods for retention in law or in official government guidance. Where such advice exists it is included in this Schedule. Where advice does not exist, it is up to us to decide how long we wish to retain records. This Schedule gathers together retention criteria from a comprehensive best practice review of a wide range of organisations across the country.

Objectives of the Retention Guidelines

The aims of the Guideline are to:

- Prevent the premature destruction of records that need to be retained for a specified period to satisfy legal, financial and other requirements of public administration
- Provide consistency for the destruction of those records not required permanently after specified periods in order to reduce the costs of unnecessary storage
- Promote improved Records Management practices within ECC which gives the public confidence that when information is destroyed it is done so according to well-considered rules.
- Assist in identifying records that may be worth preserving permanently as part of the authority's archives

Transfer of Records to a Record Office

Records identified in this schedule as 'permanent' are marked 'Offer to Archivist'. The Archivist may choose to select a sample of the records for permanent preservation in the County Archives; the remainder should be destroyed as specified in the Schedule. The sample may be random, selective or purposeful.

'Offer to Archivist for review' is used to indicate record classes where the Archivist will not usually be interested in retaining the class of records, but may wish to retain where there is a public interest in doing so.

Records no longer required for administrative use may still retain sensitive information. The Archivist should be informed of sensitivity at the time of transfer of the material to the archives, and an appropriate closure period agreed. The closure period should comply with Freedom of Information and Data Protection legislation and any internal policy.

Data Protection law provides an exemption for information about identifiable living individuals that is held for research, statistical or historical purposes to be held indefinitely; provided specific requirements are met. It is the responsibility of the Archivist to ensure that further processing of personal data is lawful.

Destruction of Records

Whenever there is the possibility of litigation, the records and information that are likely to be affected should not be amended or disposed of until the threat of litigation has been removed.

Records that are currently (or known to be in the future) the subject of a Freedom of Information, Data Protection, Environmental Information Regulations etc.; official request or appeal, must not be destroyed until that request or appeal has been completed. To knowingly destroy a record when it is subject to a request/ complaint is an offence.

General and Miscellaneous records

There are some records that do not need to be kept at all that staff may routinely destroy in the normal course of business. However, the retention schedule must still contain reference and instructions referring to them.

This usually applies to information that is duplicated, unimportant or only of short-term value. Unimportant records or information include:

- 'With compliments' slips
- Catalogues and trade journals
- Telephone message slips
- Non-acceptance of invitations

- Trivial email messages or notes that are not related to our business
- Requests for stock information such as maps, plans or advertising material
- Out-of-date distribution lists
- Working papers which lead to a final report

Duplicated and superseded material such as manuals, drafts, forms, address books and reference copies of annual reports may be destroyed under this rule. Electronic copies of documents where a hard copy has been printed and filed, and paper faxes after making and filing a photocopy, are also covered.

Reviewing the Schedule

The schedule will be regularly reviewed and updated to ensure that we are complying with the latest legal advice. These changes will be reflected as soon as possible. Changes will be highlighted so that employees can keep track and modify their practices accordingly. The Schedule will be subject to the timetable for general review of all Information Governance policies.

Explanation of Retention Guideline Headings

REF (Reference Number)

Each identified function or entry has a unique reference number. This number can be applied to records when archiving to ensure that the correct retention period is applied.

Title

The Schedule provides a description of a process or an activity that the records support.

Data Protection Issues

Explains whether the records are likely to contain personal data.

Statutory Provisions

Details of any legislation, statutory instrument (SI) or other regulatory guidance which provide direction in how long a record should be retained

Retention Period

This field shows the length of time for which a record should be kept. This period (usually in years) can be applied from the date a record is created, when a record is closed or tied in to another specified activity such as a date of birth.

Action to be taken

This field details any action that should be taken once a retention period has expired, the level of secure destruction and will also specify whether a type of record should be transferred to the County Record Office for permanent preservation

Management of the School

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period
Governing Body				
1.1.1	Agendas for Governing Body meetings	There 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
1.1.2a	Minutes of Governing Body meetings: Principal Set (signed)	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		PERMANENT
1.1.2b	Minutes of Governing Body meetings: Inspection Copies	No		Date of meeting + 3 years
1.1.3	Reports presented to the Governing body	There 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 permanently
1.1.4	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
1.1.5	Instruments of Government including Articles of Association	No		PERMANENT
1.1.6	Trusts and Endowments managed by the Governing Body	No		PERMANENT

1.1.7	Action plans created and administered by the Governing Body	No		Life of the action plan + 3 years
1.1.8	Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years
1.1.9	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
1.1.10	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
1.1.11	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No		Date proposal accepted or declined + 3 years
1.1.12	Governor File. Information which the school holds about a Governor including contact details, published details and consents for data use	Yes		Date of leaving the role + 1 year
Management				
1.2.1	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

1.2.2	Minutes of Senior Management Team meetings and the 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
1.2.3	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
1.2.4	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
1.2.5	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
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
1.2.7	School Development Plans	No		Life of the plan + 3 years	SECURE DISPOSAL

Admissions

1.3.1	All records relating to the creation and implementation of the School Admissions' Policy	No	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then review	SECURE DISPOSAL
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1.3.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Date of admission + 1 year
1.3.3	Admissions – Unsuccessful - Appeal 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
1.3.4	Admissions – Unsuccessful – No Appeal	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Academic Year it relates to + 1 year
1.3.5	Register of Admissions	Yes	School attendance: Departmental advice for maintained schools, academies,	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made.

			independent schools and local authorities October 2014	
1.3.6	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
1.3.7a	Supplementary Information form including additional information such as religion, medical conditions etc: For successful admissions	Yes		This information should be added to the pupil file
1.3.7b	Supplementary Information form including additional information such as religion, medical conditions etc: For unsuccessful admissions (Appeals)	Yes		Until appeals process completed
1.3.7c	Supplementary Information form including additional information such as religion, medical conditions etc: For unsuccessful admissions (NO Appeal)	Yes		Academic year + 1 year
Operational Administration				
1.4.1	General file series	No		Current year + 5 years then REVIEW

1.4.2	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year
1.4.4	Newsletters and other items with a short operational use	No		Current year + 1 year
1.4.5	Visitors' Books and Signing in Sheets	Yes		Current year + 6 years then REVIEW
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW

Human Resources

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period
Recruitment				
2.1.1	All records leading up to the appointment of a new Head teacher	Yes		Date of appointment + 6 years
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
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All the relevant information should be added to the staff personal file (see below) and all other information retained for
2.1.4	Pre-employment vetting information – DBS Checks	No	DBS Update Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months
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 placed on the member of staff's personal file
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ⁴	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 [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years
Staff Management				
2.2.1	Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years
2.2.2	Timesheets	Yes		Current year + 6 years
2.2.3	Annual appraisal/ assessment records	Yes		Current year + 5 years

Disciplinary & Grievance Process				
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded ⁵	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter- agency working to safeguard and promote the welfare of children March 2015"	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned
2.3.2a	Disciplinary Proceedings oral warning	Yes		Date of warning ⁶ + 6 months
2.3.2b	Disciplinary Proceedings written warning – level 1	Yes		Date of warning + 6 months
2.3.2c	Disciplinary Proceedings written warning – level 2	Yes		Date of warning + 12 months
2.3.2d	Disciplinary Proceedings final warning	Yes		Date of warning + 18 months
2.3.2e	Disciplinary Proceedings case not found	Yes		If the incident is child protection related then see above otherwise dispose of at the conclusion of the case
Health & Safety				
2.4.1	Health and Safety Policy Statements	No		Life of policy + 3 years
2.4.2	Health and Safety Risk Assessments	No		Life of risk assessment + 3 years

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
2.4.4a	Accident Reporting Adults	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Date of the incident + 6 years
2.4.4b	Accident Reporting Children	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1981	DOB of the child + 25 years
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)	Current year + 40 years
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years
2.4.7	Process of monitoring of	No		Last action + 50 years

	areas where employees and persons are likely to have become in contact with radiation			
2.4.8	Fire Precautions log books	No		Current year + 6 years
Payroll & Pensions				
2.5.1	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years
2.5.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Retirement Benefits Schemes (Information Powers) Regulations 1995	Current year + 6 years

Financial Management of the School

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period
Risk Management & Insurance				
3.1.1	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years
Asset Management				
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years
Accounts & Statements				
3.3.1	Annual Accounts	No		Current year + 6 years
3.3.2	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW
3.3.3	Student Grant applications	Yes		Current year + 3 years
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of the budget + 3 years
3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years
3.3.6	Records relating to the collection and banking of monies	No		Current financial year + 6 years
3.3.7	Records relating to the identification and collection of debt	No		Current financial year + 6 years
Contracts				
3.4.1	All records relating to the management of contracts under seal	No	Limitation Act 1980 (Section 2)	Last payment on the contract + 12 years
3.4.2	All records relating to the management of contracts under signature	No	Limitation Act 1980 (Section 2)	Last payment on the contract + 6 years
3.4.3	Records relating to the monitoring of contracts	No		Current year + 2 years

School Funds				
3.5.1	School Fund - Cheque books	No		Current year + 6 years
3.5.2	School Fund - Paying in books	No		Current year + 6 years
3.5.3	School Fund – Ledger	No		Current year + 6 years
3.5.4	School Fund – Invoices	No		Current year + 6 years
3.5.5	School Fund – Receipts	No		Current year + 6 years
3.5.6	School Fund - Bank statements	No		Current year + 6 years
3.5.7	School Fund – Journey Books	No		Current year + 6 years
School Meals				
3.6.1	Free School Meals Registers	Yes		Current year + 6 years
3.6.2	School Meals Registers	Yes		Current year + 3 years
3.6.3	School Meals Summary Sheets	No		Current year + 3 years

Property Management

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period
Property Management				
4.1.1	Title deeds of properties belonging to the school	No		PERMANENT
4.1.2	Plans of property belong to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold.
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years
4.1.5	CCTV Register. List of	No		The year which for which the register

	CCTV cameras, locations and review outcomes.			is current + 1 year
4.1.6	CCTV Recordings: Routine automatic recording	Yes		Recordings are overwritten after 30 days
4.1.7	CCTV Recordings for Investigations. Extracts from recordings to support investigations	Yes		Retention depends on the type of investigation and who is the investigating body. If it for an external body, the recording can be deleted once a copy is transferred. If it is the organisation's investigation, then it should be retained for the same retention period as the investigation records
4.1.8	CCTV access requests. Records of requests received for copies of CCTV recordings	Yes		Retain for the year to which they relate + 1 year
Maintenance				
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years
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

Pupil Management

.Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period
Educational Record				
5.1.1a	Pupil's Educational Record: Primary	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	Retain whilst the child remains at the primary school
5.1.2a	Examination Results – Pupil Copies: Public	Yes		This information should be added to the pupil file
5.1.2b	Examination Results – Pupil Copies: Internal			This information should be added to the pupil file

5.1.3	Child Protection information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter- agency working to safeguard and promote the welfare of children 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.
5.1.4	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 inter- agency working to safeguard and promote the welfare of children March 2015"	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
5.2.1	Attendance Registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities 01/10/2014	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.
5.2.2	Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years

Special Educational Needs

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
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]
5.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil

Curriculum Management

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period
Statistics & Management Information				
6.1.1	Curriculum returns	No		Current year + 3 years
6.1.2a	Examination Results (Schools Copy)	Yes		Current year + 6 years
6.1.2b	SATS records – Results	Yes		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
6.1.2c	SATS records – Examination Papers	Yes		The examination papers should be kept until any appeals/validation process is complete
6.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years
6.1.4	Value Added and Contextual Data	Yes		Current year + 6 years
6.1.5	Self-Evaluation Forms	Yes		Current year + 6 years
Implementation of Curriculum				
6.2.1	Schemes of Work	No		Current year + 1 year
6.2.2	Timetable	No		Current year + 1 year
6.2.3	Class Record Books	No		Current year + 1 year

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	
6.2.6	Pupils' Work	No		Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the school's policy then current year + 1 year	SECURE DISPOSAL

Extra-Curricular Activities

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	
Educational Visits outside the Classroom					
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit + 14 years	SECURE DISPOSAL
7.1.2	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.
7.1.3	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil involved in the incident + 25 years. The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils	SECURE DISPOSAL

Walking Bus					
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]

Family Liaison

7.3.1	Day Books	Yes		Current year + 2 years then review	
7.3.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	
7.3.3	Referral forms	Yes		While the referral is current	
7.3.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	
7.3.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	
7.3.6	Group Registers	Yes		Current year + 2 years	

Central Government and Local Authority

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	
LEA					
8.1.1	Attendance Returns	Yes		Current year + 1 year	SECURE DISPOSAL
8.1.2	School Census Returns	No		Current year + 5 years	SECURE DISPOSAL
8.1.3	Circulars and other information sent from the Local Authority	No		Operational use	SECURE DISPOSAL
Central Government					
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

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	
Information Governance					
9.1.2	Information Governance Report. Annual statement to Governing Body on compliance with Information law, including DPO statement, performance data and audit outcomes	No		Current year + 1 year	
9.1.3	Freedom of Information Requests	Yes		Closure + 1 year	SECURE DISPOSAL
9.1.4	Environmental Information Requests	Yes		Closure + 1 year	SECURE DISPOSAL
9.1.5	Subject Access Requests	Yes		Closure + 5 years	SECURE DISPOSAL
9.1.6	ICO Complaints: No further action	Yes		Closure + 1 year	SECURE DISPOSAL
9.1.7	ICO Complaints: Action required	Yes		Closure + 2 years	SECURE DISPOSAL