

Records Retention Schedule

Cardinal Newman Catholic High School



**CARDINAL
NEWMAN**
CATHOLIC HIGH SCHOOL



DIOCESE OF
SHREWSBURY

Approved by: Ms J Langstaff

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Next review due by: 24th June 2021

Cardinal Newman Catholic High School
Records Retention Schedule

Cardinal Newman Catholic High School recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited. It covers:

- ❖ Scope
- ❖ Responsibilities
- ❖ Relationships with existing policies

Scope of the policy

This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions. Records are defined as all these documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically. A small percentage of the school's records will be selected for permanent preservation as part of the institution's archives. Consideration will be given to data protection issues when any document relates to individual pupils or member of staff.

Responsibilities

The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher.

The person responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's record management guidelines.

This retention schedule has been informed and guided by the *Information and Records Management Society's toolkit for schools* (<https://irms.org.uk/page/SchoolsToolkit>)

Relationship with existing policies

This policy has been drawn up within the context of:

- ❖ Freedom of Information policy
- ❖ Data Protection policy

And any other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

Review dates

To ensure the effectiveness of the policy it will be monitored and reviewed in light of any legislative or organisational changes. We reserve the right to change this policy at any time.

Signed _____ Headteacher

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1. Governing Body

1.1 Management of Governing Body				
	Description	Statutory provision	Minimum Retention Period	Disposal method
1.1.1	Agendas for Governing Body meetings		One copy retained with the master set of minutes	
1.1.2	Minutes of Governing Body Meetings			
	Principal set (signed)		Permanent	
	Inspection Copies		Date of meeting + 3yrs	Secure disposal
1.1.3	Records relating to the election of parent and staff governors not appointed by the governors		Date of election + 6mths	Secure disposal
1.1.4	Records relating to the appointment of co-opted governors		If decision to appoint has been recorded in minutes then records can be destroyed once the governor has finished their term of office	Secure disposal
1.1.5	Records relating to the election of chair and vice chair		Once decision to appoint has been recorded in minutes then records can be destroyed	Secure disposal
1.1.6	Scheme of delegation and terms of reference for committees		Until superseded, or whilst relevant	Secure disposal
1.1.7	Meeting schedules		Current year	Standard disposal
1.1.8	Reports presented to the Governing Body which are referred to in the minutes		Date of meeting + 10yrs	Secure disposal
1.1.9	Register of attendance at full Governors meeting		Date of last recorded meeting + 6yrs	Standard disposal
1.1.10	Records relating to Governor Monitoring Visits		Date of last visit + 3yrs	Secure disposal
1.1.11	Instruments of Government including Articles of Association		Permanent	Retained in the school archive and offered to county archives should the school close
1.1.12	Trusts and Endowments managed by the Governing Body		Permanent	Retained in the school archive and offered to county archives should the school close
1.1.13	Action plans created and administered by the Governing Body		Until superseded, or whilst relevant	Secure disposal
1.1.14	Policy documents created and administered by the Governing Body		Until superseded, or whilst relevant	Secure disposal

1.1.15	Records relating to complaints dealt with by the Governing Body		Date of resolution of complaint + minimum of 6yrs then review.	Secure disposal
1.1.16	Correspondence sent and received by the governing body or head teacher		General correspondence retained for current year + 3yrs	Secure disposal
1.1.17	Proposals concerning the change of status of a maintained school into Specialist Status School or Academy		Date proposal accepted or declined + 3yrs	Secure disposal

1.2 Governor Management				
	Description	Statutory provision	Minimum Retention Period	Disposal method
1.2.1	Records relating to the appointment of a clerk to the governing body		Date on which appointment ceases + 6yrs	Secure disposal
1.2.2	Records relating to the terms of office of serving governors, including evidence of appointment		Date on which appointment ceases + 6yrs	Secure disposal
1.2.3	Records relating to governor declaration against disqualification criteria		Date on which appointment ceases + 6yrs	Secure disposal
1.2.4	Register of business interests		Date on which appointment ceases + 6yrs	Secure disposal
1.2.5	Governors code of conduct		One copy of each version should be kept for the life of the organisation	Secure disposal
1.2.6	Records relating to the training required and received by Governors including induction programme		Date on which appointment ceases + 6yrs	Secure disposal
1.2.7	Records relating to DBS checks – clerk and governors		Date of DBS check + 6mths	Secure disposal
1.2.8	Governor personnel files		Date on which appointment ceases + 6yrs	Secure disposal

2. School Management

2.1 Headteacher and Senior Management Team				
	Description	Statutory provision	Minimum Retention Period	Disposal method
2.1.1	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies		Date of the meeting + 3yrs then review	Secure disposal
2.1.2	Reports created by the Headteacher or Management Team		Date of the report + 3yrs then review	Secure disposal
2.1.3	Records created by head teacher, deputy/assistant head teacher, head of year and other members of staff with pastoral responsibilities		Current academic year + 6yrs then review	Secure disposal
2.1.4	Correspondence created by headteacher, deputy/assistant head teacher, head of year and other members of staff with pastoral responsibilities		Date of correspondence + 3yrs then review	Secure disposal
2.1.5	School Development Plans		Life of the plan + 3yrs	Secure disposal

2.2 Operational Administration				
	Description	Statutory provision	Minimum Retention Period	Disposal method
2.2.1	General file series which do not fit under any other category		Current year + 5yrs then review	Secure disposal
2.2.2	Records relating to the creation and publication of the school prospectus		Current year + 3yrs	Standard disposal
2.2.3	Records relating to the creation and distribution of circulars to staff, parents or pupils		Current year + 1yr	Standard disposal
2.2.4	Newsletters and other items with a short operational use		Current year + 1yr	Standard disposal
2.2.5	Visitor's signing in sheets		Current year + 6yrs then review	Secure disposal
2.2.6	Records relating to the creation and management of PTA and / or Old Pupils Association		Current year + 6yrs then review	Secure disposal
2.2.7	School privacy notice which is made available for parents/pupils as part of GDPR compliance		Until superseded + 6yrs	Standard disposal
2.2.8	Consents relating to school activities as part of GDPR compliance		Consent will last whilst pupil is at school and can be destroyed or retained on pastoral file when they leave	Secure disposal

2.3 Human Resources - Recruitment				
	Description	Statutory provision	Minimum Retention Period	Disposal method
2.3.1	All records leading up to the appointment of a new headteacher		Date of appointment + 6yrs	Secure disposal
2.3.2	All records leading up to the appointment of a new member of staff-unsuccessful candidates		Date of appointment of successful candidate + 6mths	Secure disposal
2.3.3	All records leading up to the appointment of a new member of staff-successful candidates		All relevant information should be added to the personal file (see below) all other information retained for 6mths	Secure disposal
2.3.4	Pre-employment vetting information-DBS checks-successful candidates	DBS Update service Employer Guide June 2014: Keeping children safe in education July 2018(Statutory Guidance from Dept. of education) Sections 73,74	Application forms, references and other documents-for the duration of the employee's employment + 6yrs	Secure disposal
2.3.5	Proof of identity collected as part of the process of checking 'portable' enhanced DBS disclosure		Should be carried out on-line. If a paper copy then retain in personal file.	Secure disposal
2.3.6	Pre-employment vetting information - evidence proving the right to work in the UK	An employer's guide to right to work checks (Home Office May 2015)	Add to staff personal file. If stored separately Home Office requires documents are kept for termination of employment plus not less than 2yrs	Secure disposal

2.4 Operational Staff Management				
	Description	Statutory provision	Minimum Retention Period	Disposal method
2.2.1	Staff Personal File	Limitation Act 1980 (Section 2)	Termination of Employment + 6yrs	Secure disposal
2.2.2	Timesheets		Current year + 6yrs	Secure disposal
2.2.3	Annual appraisal / assessment records		Current year + 6yrs	Secure disposal

2.5 Management of Disciplinary and Grievance Processes				
	Description	Statutory provision	Minimum Retention Period	Disposal method
2.5.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	"Keeping children safe in education. Statutory guidance for schools and colleges. September 2018" "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children. 2018"	Until the persons normal retirement age or 10yrs from the date of the allegation, whichever is the longer, then review. NOTE- allegations that are 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.	Secure disposal- these records must be shredded.
2.5.2	Disciplinary proceeding			Secure disposal - if placed on personal files then they must be weeded from the file
	Oral warning		Date of warning + 6mths	
	Written warning – level 1		Date of warning + 6mths	
	Written warning – level 2		Date of warning + 12mths	
	Final warning		Date of warning + 18mths	
	Case not found		If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	

2.6 Payroll and Pensions				
	Description	Statutory provision	Minimum Retention Period	Disposal method
2.6.1	Absence & sickness records		Current year + 6yrs	Secure disposal
2.6.2	Maternity pay records		Current year + 6yrs	Secure disposal
2.6.3	Timesheets including Overtime		Current year + 6yrs	Secure disposal
2.6.4	Payroll awards		Current year + 6yrs	Secure disposal
2.6.5	Pre-payroll and payroll report		Current year + 6yrs	Secure disposal
2.6.6	Personal bank details		Until superseded + 6yrs	Secure disposal

2.7 Workforce Identity				
	Description	Statutory provision	Minimum Retention Period	Disposal method
2.7.1	Images used for identification purposes		Termination of Employment + 6yrs	Secure disposal
2.7.2	Images used in displays in school		Until the display is refreshed	Secure disposal
2.7.3	Images used for social media, marketing or other purposes		Until the media source is refreshed or in line with the document retention period	Secure disposal
2.7.4	Biometric data		Deleted once staff member leaves school	Secure disposal

2.8 Health and Safety				
	Description	Statutory provision	Minimum Retention Period	Disposal method
2.8.1	Health and Safety policy statements		Life of policy +3yrs	Secure disposal
2.8.2	Health and Safety risk assessments		Life of risk assessment +3yrs, provided that a copy of the assessment is also stored with the accident report if an incident has occurred.	Secure disposal
2.8.3	Records relating to any reportable death, injury, disease or dangerous occurrence.	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 (Regulation 12(2))	Date of incident +3yrs provided that all records relating to the incident are held on personnel file.	Secure disposal
2.8.4	Accident reporting records	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980. Social Security (Claims & Payments) Regulations 1979 SI 1979 No 628. Security (Claims & Payments) SI 1987 No 1968 revokes all but Part 1 of SI 1979 no 628. Social Security Administration Act 1992 Sec. 8 Social Security (Claims & Payments) amendments (No30 Regulations 1993 SI 1993 No 2113.		
	Adults (at the time of the incident)		The Accident Book-3 yrs after the date of the last entry.	Secure disposal
	Children		The Accident Book-3 yrs after the date of the last entry.	Secure disposal
2.8.5	Control of Substances Hazardous to Health (COSHH)	Control of Substances Hazardous to Health 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)	Date of incident + 40yrs	Secure disposal
2.8.6	Process of monitoring of areas where employees and persons are	Control of Asbestos at Work Regulations 2012 SI 1012 No 632	Last action + 40yrs	Secure disposal

	likely to have become in contact with asbestos.	Regulation 19		
2.8.7	<p>Process of monitoring of areas where employees and persons are likely to have become in contact with radiation. Maintenance records or controls, safety features and PPE.</p> <p>_____</p> <p>Dose assessment and recording</p>	The Ionising Radiation Regulations 2017. SI 2017 No 1075 Regulation 11. As amended by SI2018 No 390 Personal Protective Equipment (Enforcement) Regulations 2018	<p>2 yrs from the date of examination - records to include the condition of the equipment at the time of the examination.</p> <p>_____</p> <p>To keep the records made and maintained until the person to whom the record relates has (or would have) reached 75 yrs of age. Minimum retention period 30 yrs from date of record.</p>	Secure disposal
2.8.8	Fire Precautions log books		Current year + 3yrs	Secure disposal

3. Financial Management of the School

3.1 Risk Management and Insurance				
	Description	Statutory provision	Minimum Retention Period	Disposal method
3.1.1	Employer's Liability Insurance Certificate		Closure of the school + 40yrs	Secure disposal

3.2 Asset Management				
	Description	Statutory provision	Minimum Retention Period	Disposal method
3.2.1	Inventories of furniture and equipment		Current year + 6yrs	Secure disposal
3.2.1	Burglary, theft and vandalism report forms		Current year + 6yrs	Secure disposal

3.3 Accounts and Statements (including budget management)				
	Description	Statutory provision	Minimum Retention Period	Disposal method
3.3.1	Annual Accounts		Current year + 6yrs	Standard disposal
3.3.2	Loans and grants managed by the school		Date of the last payment +12yrs then review	Secure disposal
3.3.3	Student Grant Applications		Current year + 3yrs	Secure disposal
3.3.4	All records relating to the creation		Life of the budget +	Secure disposal

	and management of budgets including the Annual Budget statement and background papers		3yrs	
3.3.5	Invoices, receipts, order books and requisitions, delivery notes		Current financial year + 6yrs	Secure disposal
3.3.6	Records relating to the collection and banking of monies		Current financial year + 6yrs	Secure disposal
3.3.7	Records relating to the identification and collection of debt		Final payment of debt + 6yrs	Secure disposal

3.4 Contract Management				
	Description	Statutory provision	Minimum Retention Period	Disposal method
3.4.1	All records relating to the management of contracts under seal	Limitation Act 1980	Last payment of the contract + 12yrs	Secure disposal
3.4.2	All records relating to the management of contracts under signature	Limitation Act 1980	Last payment of the contract + 6yrs	Secure disposal
3.4.3	Records relating to the monitoring of contracts		Current year + 6yrs	Secure disposal

3.5 School Fund				
	Description	Statutory provision	Minimum Retention Period	Disposal method
3.5.1	School fund-cheque books		Current year + 6yrs	Secure disposal
3.5.2	School fund-paying in books		Current year + 6yrs	Secure disposal
3.5.3	School fund-ledger		Current year + 6yrs	Secure disposal
3.5.4	School fund-invoices		Current year + 6yrs	Secure disposal
3.5.5	School fund-receipts		Current year + 6yrs	Secure disposal
3.5.6	School fund-bank statements		Current year + 6yrs	Secure disposal
3.5.7	School fund-journey books		Current year + 6yrs	Secure disposal

3.6 School Meals Management				
	Description	Statutory provision	Minimum Retention Period	Disposal method
3.6.1	Free School Meals Register		Current year + 6yrs	Secure disposal
3.6.2	School Meals Register		Current year and then data anonymised by service provider	Secure disposal
3.6.3	School Meals Summary Sheets		Current year + 6yrs	Secure disposal

4. Property Management

4.1 Property Management				
	Description	Statutory provision	Minimum Retention Period	Disposal method
4.1.1	Records relating to the letting of school premises		Current financial year + 6yrs	Secure disposal

4.2 Maintenance				
	Description	Statutory provision	Minimum Retention Period	Disposal method
4.2.1	All records relating to the maintenance of the school carried out by contractors		Current year + 6yrs	Secure disposal
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books		Current year + 6yrs	Secure disposal

4.3 CCTV images				
	Description	Statutory provision	Minimum Retention Period	Disposal method
4.3.1	Storage of CCTV images		Date of recording + 5mths then review. Occasionally recordings may be retained subject to review with the consent of the headteacher where there is a valid reason.	Secure disposal

5. Pupil Management

5.1 Admissions Process				
	Description	Statutory provision	Minimum Retention Period	Disposal method
5.1.1	All records relating to the creation and implementation of the School Admissions' Policy	School Admissions code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Date of the policy + 3yrs then review	Secure disposal
5.1.2	Admissions - if the admission is successful	As above	Date of admission + 1yr	Secure disposal
5.1.3	Admission - if the appeal is	As above	Resolution of case +	Secure disposal

	unsuccessful		1yr	
5.1.5	Admission - casual		Current year + 1yr	Secure disposal
5.1.6	Proof of address supplied by parents as part of the admission process	As above	Current year + 1yr	Secure disposal
5.1.7	Supplementary information form including additional information such as religion. Medical conditions etc. For successful admissions For unsuccessful admissions		Information should be added to the pupil file Until appeals process completed	Secure disposal Secure disposal
5.1.8	<i>Home address</i>		<i>Whilst the pupil remains at school + 3yrs</i>	Secure disposal
5.1.9	<i>Emergency contact details</i>		<i>Deleted in a timely manner once pupil leaves school or upon parental request</i>	Secure disposal

5.2 Pupil's Education Record.

	Description	Statutory provision	Minimum Retention Period	Disposal method
5.2.1	Pupil's Educational Record by The Education (Pupil Information) (England) Regulations 2005 Which includes: Behaviour/incident records Exclusions information	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 Limitation Act 1980 (section 2)	Date of Birth of the pupil + 25yrs-NOTE- Files are routinely disposed of by cohort	Secure disposal
5.2.2	Public Examination Results-Pupil Copies		Date of Birth of the pupil +25yrs on pupil record. External exam certificates - minimum retention period 12m. Uncollected certificates are held indefinitely (storage space permitting) awaiting collection in view of the cost in obtaining a duplicate.	Secure disposal at the schools discretion after minimum retention period
5.2.3	School Report	Education (Pupil Information) (England) Regulations 2005, SI 2005/1437)	Date of Birth of the pupil + 25yrs	Secure disposal
5.2.4	Child Protection information held on pupil file	"Keeping children safe in education. Statutory guidance for schools and colleges. 2019" "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children. March 2018"	If records are placed in pupil file they should be in a sealed envelope and retained for the same period of time as the pupil file (DOB of the child +25yrs).These records will be subject to any	Secure disposal

			instruction given by IICSA.	
5.2.5	Child Protection information held in separate files	<p>"Keeping children safe in education. Statutory guidance for schools and colleges. 2019"</p> <p>"Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children. March 2018"</p>	<p>DOB of the child + 25yrs then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy will be found on the LA Social Services record. These records will be subject to any instruction given by IICSA.</p>	Secure disposal

5.3 Attendance				
	Description	Statutory provision	Minimum Retention Period	Disposal method
5.3.1	Attendance Registers	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Whilst the pupil remains at school + 3yrs	Secure disposal
5.3.2	Correspondence relating to any absence (authorised or unauthorised)	Education Act 1996 Section 7	Current academic year + 2yrs	Secure disposal

5.4 Special Educational Needs (SEN)				
	Description	Statutory provision	Minimum Retention Period	Disposal method
5.4.1	SEN files, reviews and Education Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy.	Children and Family's Act 2014; Special Educational Needs and Disability act 2001 Section 14	For EHCP(2015 onwards)-Date of Birth of the pupil + 31yrs (as a EHCP is valid until the individual reaches 25 years of age and the additional 6yrs is in line with the Limitation Act 1980) For all other SEN Date of Birth of the pupil + 25yrs	Secure disposal

5.5 Identity				
	Description	Statutory provision	Minimum Retention Period	Disposal method
5.5.1	Images (pupil photograph) retained for identification purposes		Whilst the pupil remains at school +3yrs	Secure disposal
5.5.2	Images used in displays in school		Until the display is refreshed	Secure disposal
5.5.3	Images used for social media, marketing or other purposes		Until the media source is refreshed or in line with the document retention period	Secure disposal
5.5.4	Biometric data		Deleted in a timely manner once pupil leaves school or upon request	Secure disposal

6. Curriculum Management

6.1 Statistics and Management Information				
	Description	Statutory provision	Minimum Retention Period	Disposal method
6.1.1	Curriculum returns		Current year + 3yrs	Secure disposal
6.1.2	Examination results (school copy)		Current year + 6yrs	Secure disposal
	SATs results (KS1/2)		Retained in pupil education file/records.	Secure disposal
6.1.3	Published Admission Number Reports (PAN)		Current year + 6yrs	Secure disposal
6.1.4	Value Added and Contextual Data		Current year + 6yrs	Secure disposal
6.1.5	Self Evaluation Forms		Current year + 6yrs	Secure disposal

6.2 Implementation of Curriculum				
	Description	Statutory provision	Minimum Retention Period	Disposal method
6.2.1	Schemes of work		Current year + 1yr	Secure disposal
6.2.2	Timetable		Current year + 1yr	Secure disposal
6.2.3	Class Record Books		Current year + 1yr	Secure disposal
6.2.4	Mark Books		Current year + 1yr	Secure disposal
6.2.5	Record of homework set		Current year + 1yr	Secure disposal
6.2.6	Pupils work		Should be returned to pupil at the end of the academic year.	Secure disposal (where pupil can be identified) if not returned to pupil

7. Extra-Curricular Activities

7.1 Educational Visits outside the Classroom				
	Description	Statutory provision	Minimum Retention Period	Disposal method
7.1.1	Records created by school to obtain approval to run an Educational Visit outside the classroom	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info/ Section 3 "Legal Framework and Employers Systems" and Section 4 –"Good Practice"	Date of visit + 10yrs	Secure disposal
7.1.2	Parental consent forms for school trips where there has been no major incident		Conclusion of the trip	Secure disposal once satisfied the trip has returned without incident
7.1.3	Parental consent forms for school trips where there has been a major incident	Limitation Act 1980 (section 2)	DOB of the pupil involved in the incident +25yrs. Permission slips for all pupils on the trip must be retained as evidence that the rules have been followed for all pupils.	Secure disposal

7.2 Family Liaison Officer and Home School Liaison Assistants				
	Description	Statutory provision	Minimum Retention Period	Disposal method
7.2.1	Day books		Current year + 2yrs then review	Secure disposal
7.2.2	Reports from outside agencies- where the report has been included on the case file created by an outside agency		Whilst child is attending school then destroy	Secure disposal
7.2.3	Referral forms		Whilst the referral is current	Secure disposal
7.2.4	Contact data sheets		Current year then review, if contact is no longer active then destroy	Secure disposal
7.2.5	Contactable database entries		Current year then review, if contact is no longer active then destroy	Secure disposal
7.2.6	Group registers		Current year + 2yrs	Secure disposal

8. Central Government and Local Authority

8.1 Local Authority				
	Description	Statutory provision	Minimum Retention Period	Disposal method
8.1.1	Attendance Returns		Current year + 1yr	Secure disposal
8.1.2	School census returns		Current year + 5yrs	Secure disposal
8.1.3	Circulars and other information sent from the Local Authority		Operational use	Secure disposal

8.2 Central Government				
	Description	Statutory provision	Minimum Retention Period	Disposal method
8.2.1	OFSTED reports and papers		Life of the report then review	Secure disposal
8.2.2	Returns made to central government		Current year + 6yrs	Secure disposal
8.2.3	Circulars and other information sent from the central government		Operational use	Secure disposal