



Data Destruction Policy

For the following Academies:

Crawley Ridge Infant School
Crawley Ridge Junior School
Holy Trinity Primary School
Windlesham Village Infant School
Connaught Junior School

This policy will be reviewed by the Trust Board: Spring 2023
Review Date: Spring 2025

Introduction

The aim of this Policy is to enable The Alliance Multi Academy Trust (TAMAT) to manage our records effectively and in compliance with Data Protection and other regulations. As an organisation we collect, hold, store and create significant amounts of data and information. This Policy will provide a framework for retention and disposal of information and documents.

The Alliance Multi Academy Trust (TAMAT) is committed to the principles that it will only retain information for as long as necessary for the purpose concerned.

The table below sets out the main categories of information we hold in key areas of our work, the length of time we intend to hold them and the reason for this.

This Policy also sets out the destruction procedure for documents at the end of their retention period. The Data Protection Officer shall be responsible for ensuring that this is carried out appropriately, and any questions relating to the destruction should be referred to them.

If a document or piece of information is reaching the end of its stated retention period, but you are of the view that it should be kept longer, please refer to the Data Protection Officer who will make a decision on whether it should be kept, for how long, and note the new time limit and reasons for extension.

Document Retention Period

Document Type	Legislation/Reason for Retention	Requirement
Company Records		Permanent
Company Articles of Association/Rules	Companies Act 2006 Charities Act 2011	Permanent
Academy Funding Agreements	Charities Act 2011	Permanent
Trustee Minutes of Meetings and Resolutions	Companies Act 2006 Charities Act 2011	Date of the Meeting + a minimum of 10 years
Member's meetings Minutes/Resolutions	Companies Act 2006 Charities Act 2011	Date of the Meeting + a minimum of 10 years
Documents of clear historical significance	Data Protection Regulation	Permanent
Contracts (suppliers or grants)	Limitation Act 1980	Last payment date on the contract + 6 years
Contracts executed as deeds	Limitation Act 1980	Last payment date + 12 years
IP Records and legal files re provision of service	Limitation Act 1980	Term of the Contract + 6 years
TAX AND FINANCE		
Annual Accounts and review (including transferred records on Trust setup)	Companies Act 2006 Charities Act 2011	Permanent
Tax and Accounting Records (Invoices, receipts, orders)	Finance Act 1998 Taxes Management Act 1970	Current tax year + 6 years
Information Relevant to VAT	Finance Act 1988 HMRC	Current year + 6 years
Banking Records/Receipts/Book Sales Ledger	Companies Act 2006 Charities Act 2011	Current year + 6 years
Employee/Administration		
Payroll/Tax/NI/Employee Information	Taxes Management Act 1970/PAYE Regulations	Current year + 6 years

Maternity Pay	Statutory Maternity Pay Regulations	Current year + 3 years
National Minimum Wage Records	National Minimum Wage Act	Current year + 3 years
Foreign National ID Documents	Immigration (Restrictions on Employment) Act 2007	2 years after the end of employment
HR Files and Training Records	Limitation Act 1970 and Data Protection Regulation	6 years following the end of employment
Records - Working Time	Working Time Regulations 1998 as amended	2 years
Job Applications (CV's and related material re unsuccessful candidates)	ICO Employment Practices Code (Recruitment & Selection) Disability Discrimination Act 1995 & Race Relations Act 1976	6 months from notification of outcome of application
Pre-Employment/Volunteer Vetting	ICO Employment Practice Code	2 years
Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Keeping Children Safe in Education (updated versions) Working Together to Safeguard Children. A guide to interagency working to safeguard promote and safeguard the welfare of children March 2015	Until the person's normal retirement age or 10 years from the date of the allegation whichever is longer the Review. 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
Disclosure & Barring Service Checks	Single Central Records Requirement under Part 4 of the Schedule to Education (Independent Schools Standards) Regulations 2014	Copies can now be kept in Personnel file. Keep in line with current HR process (6 years plus current year)
Volunteer Records		6 months following the end of the volunteer leaving
INSURANCE		
Employers Liability Insurance	Employers' Liability (Compulsory Insurance Regulation) 1998	40 years
Policies	Commercial	3 years
Claims Correspondence	Commercial	3 years after settlement

Health & Safety/Medical		
General Records	Limitation Act 1970	At least 3 years
Health & Safety Risk Assessments		At least 3 years
Records re Hazardous Substances	Control of Hazardous Substances to Health Regulations 2002	Permanent
Accident Books/Records and Reports	Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995	At least 3 years following report
Medical Scheme Documentation	Commercial	Unless permanent data is included keep permanently
Process of monitoring of areas where employees and persons are likely to become in contact with asbestos	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Permanent
Fire Precaution Log Books		Current + 6 years
Premises & Property		
Original Title Deeds		Permanent
Leases	Limitation Act 1980	Permanent
Building Records, Plans, Consents and certification and warranties	Limitation Act 1980	Permanent
All Records relating to the management of contracts under signature.	Limitation Act 1980	Current + 6 years
Records relating to the Monitoring of Contracts		Current + 2 years
Records relating to the letting of academy premises		Current + 6 years
All records relating to the maintenance of the academy employees including maintenance log books		Current + 6 years
Pension Records		
Employee and Workers Records		Current year + 6 years
Records relating to the Pension		

Scheme		Current year + 6 years
Records re Active Members opt in/opt out		Permanent
Trust Deed/Rules and HMRC Approvals		Permanent
Pupils		
Educational Record	Pupil Information Regulations 2005 (maintained schools only). Same approach applied in Academy context. Data Protection Regulation	File passed to new school – no retention of any data
Child Protection Information (on Child's File)	<p>"Keeping Children Safe in Education Statutory guidance for schools 2016"</p> <p>"Working Together to Safeguard Children. A Guide to inter-agency working to safeguard and promote the welfare of children February 2017"</p>	<p>Sent securely to next school and obtain acknowledgement of receipt</p> <p>A copy can be made and kept until this acknowledgement has been received, then all copies destroyed</p>
Child Protection Information in Other Files	<p>"Keeping Children Safe in Education Statutory guidance statutory guidance for schools and colleges September 2016"</p> <p>"Working Together to Safeguard Children. A guide to inter agency working to safeguard and promote the welfare of children February 2017"</p>	<p>Sent securely to next school and obtain acknowledgement of receipt</p> <p>A copy can be made and kept until this acknowledgement has been received, then all copies destroyed</p>
Special Educational Needs		
SEN Files	Limitation Act 1980	File passed to new school – no retention of any data
Educational Health Care Plans (EHCP)	<p>Special Educational Needs and Disability Regulations 2014</p> <p>Children & Families Act 2014, Part 3</p>	File passed to new school – no retention of data
Attendance Registers	Pupil Registration Regulations 2006 Regulation 14	<p>Any paper register is immediately recorded digitally and destroyed</p> <p>For computerised registers retain until 3 years after the end of the school year during which the</p>

		entry was made. This applies to every backup copy
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Parents		
	<p>Pupil Registration Regulations 2006</p> <p>For basic name and contact details</p> <p>Otherwise usually operational in accordance with the statutory functions of the school</p>	<p>For as long as the child is at the relevant school.</p> <p>Can be case by case</p>

Local Governing Body/Academy		
Agenda Governing Body Meetings		One copy to be kept with the master copy of the minutes
Minutes of Meeting (Signed Copy)		Permanent
Reports presented to the Governing Body		Keep for 6 years, however should the minutes refer to individual reports they must be kept permanently
Action plans from LAB Meeting		3 years
Information/Actions resulting from complaints to the Governing Body		From date of complaint + 6 years in the first instance, then review
Minutes of SLT Meetings		3 years, then review
Professional Development Plans		6 years
School Development Plans		3 years
Information relating to Admissions/Policy		3 years
information relating to Admissions (Including Appeals)		Date of Admission/Appeal + 1 year
Information on School Meals (Registers/Summary Sheets)		Current + 3 years

Deletion of Documents

When a document is at the end of its retention period it should be dealt with in accordance with this Policy.

Confidential Waste

If any papers are stored prior to the end of the retention period they must be stored in a secure cupboard/drawer.

All confidential waste should be shredded. If using an external company keep a copy of the certificate provided securely.

Anything that contains personal details should be treated as confidential.

Other documentation can be deleted or placed in recycling bins where appropriate.

Automatic Deletion

Some information may be archived by the computer system. Should you have a need to retrieve any information, please contact the relevant IT support attached to your school.

Individual Responsibility

Most documents for retention, deletion or deletion will be automatic however if reviewing an individual document please take the following into account:

- Has the document come to the end of its life
- Are there any legal requirements for keeping the information or document for a set period. Please refer to the information above.
- Would the information be required in future for any potential legal proceedings (i.e relating to a child protection issue).
- Is the document of historical or statistical importance.

If a decision is made to keep a document outside of the Retention Period held within this document it should be discussed with the Data Protection Officer providing a reason for retention.

Each Academy should retain a copy of the Checklist and record all data disposed of for future reference.

