

# Data Retention Policy

## Vision

Our vision is that children are nurtured to love learning, love one another and love God.

*'Love learning, love one another, love God.'*

Love the Lord your God with all your heart, soul, mind and strength and love your neighbour as yourself  
(Mark 12)



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## **School Records Management Policy**

Holy Trinity CE Primary 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 school. 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.

### **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 those 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 and for historical research. This should be done in liaison with the County Archives Service.

## **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 Head of the School.

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 records management guidelines.

Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information policy
- Data Protection policy
- Data Privacy Notices
- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

## **Safe Disposal of Records**

Where records have been identified for destruction they should be disposed of in an appropriate way. All records containing personal information, or sensitive policy information, should be shredded before disposal using a crosscut shredder. Any other records should be bundled up and disposed of to a wastepaper merchant or disposed of in other appropriate ways. Do not put records in the dustbin or a skip.

There are companies who can provide confidential waste bins and other services which can be purchased to ensure that records are disposed of in an appropriate way.

The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed and who authorised their destruction.

Members of staff should record at least:

- File reference (or other unique identifier).
- File title (or brief description) and number of files.
- The name of the authorising officer and the date action taken.

This should be kept in an Excel spreadsheet or similar suitable format and can be found GDPR file on staff shared drive. Record of Destruction is kept with invoice.

## School Closures

It is the responsibility of each Local Authority [LA] to manage the records of closed schools until they have reached the end of their administrative life and to arrange for their disposal when required.

There may be a number of different reasons why schools close which may affect where school records need to be stored.

- If Holy Trinity CE Primary School has been closed and the site is being sold or reallocated to another use, then the LA should take responsibility for the records from the date the school closes.
- If two schools have merged and function as one school, it will be necessary for the new school to retain any records originating from the two schools for the appropriate time.
- If Holy Trinity CE Primary School closes and subsequently becomes an Academy, the records relating to the pupils who are transferring to the Academy will be transferred. If the Academy is retaining the current buildings, then all records relating to the maintenance of the buildings should also be transferred. All other records become the responsibility of the Local Authority.

## The purpose of the retention guidelines

The retention schedule lays down the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative use. The retention schedule lays down the basis for normal processing under the Data Protection Act 2018 the Freedom of Information Act 2000 and the General Data Protection Regulation 2016. The retention periods are informed by other legislation such as Education Act 1995, Limitation Act 1990, the Information management toolkit for schools has been consulted for posterity. Members of staff are expected to manage their current record keeping systems using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems.

The retention schedule refers to record series regardless of the media in which they are stored.

## What to do with records once they have reached the end of their administrative life

### Destruction of records

Where records have been identified for destruction they should be disposed of in an appropriate way. All records containing personal information, or confidential policy information should be shredded before disposal.

### Transfer of records to the Archives

Where records have been identified as being worthy of permanent preservation, arrangements should be made to transfer the records to the Archives.

### Transfer of information to other media

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media. The lifespan of the media and the ability to migrate data where necessary should always be considered.

## Data Retention Schedule

### Management of the School

This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Headteacher and the senior management team, the admissions process and operational administration.

Governors					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Agendas for Governing Body Meetings-Principal Copy	No		Where possible the agenda should be stored with the principal set of the minutes.	Secure Disposal	
Records relating to DBS checks carried out on clerk and the members of the governing body	Yes		Date of DBS check + 6 years	Secure Disposal	
Governor Personal Files	Yes		Date appointment ceases + 6 years	Secure Disposal	
Records relating to the induction program for new governors	No		Date appointment ceases + 6 years	Secure Disposal	
Records relating to the training required and received by Governors	Yes		Date appointment ceases + 6 years	Secure Disposal	
Records Relating to the appointment of a clerk to the governing body	Yes		Date appointment ceases + 6 years	Secure Disposal	
Records Relating to Governor declaration of Disqualification criteria	Yes		Date appointment ceases + 6 years	Secure Disposal	
Register of Business Interests	Yes		Date appointment ceases + 6 years	Secure Disposal	
Records relating to the Election of parent and Staff governors not appointed by the governors	Yes		Date of election + 6 months	Secure Disposal	

Record of attendance at full governing Board Meetings	Yes		Date of Meeting + 6 years	Secure Disposal	
Correspondence sent and received by the governing body or head teacher	Yes		Current year + 3 years	Secure Disposal	
Minutes of Governing Body meetings- Principle Set (signed)	Yes		Although generally kept for the life of the organisation the LA is only required to make this available for 10 years from the Date of meeting.	Secure Disposal	Transfer to Archives when the school has closed
Reports presented to the Governing Body which are referred to in the minutes.	No		Although generally kept for the life of the organisation the LA is only required to make this available for 10 years from the Date of meeting.		Transfer to Archives
Instruments of Government including Articles of Association	No		Permanent	Retain in school	Transfer to Archives when the school has closed
Trusts and Endowments managed by the Governing Body	No		Permanent	Retain in school whilst operationally required	Transfer to Archives when the school has closed
Action plans created and administered by the Governing Body	No		Until superseded or whilst relevant	Secure Disposal	It may be appropriate to offer to the Archives
Policy documents created and administered by the Governing Body	No		Until superseded	Retain in school whilst policy is operational	Transfer to Archives
Records relating to complaints dealt with by the Governing Body	Yes		Major Complaints Date of resolution of complaint + 6 years Complaints involving allegations of Negligence Date of resolution of complaint + 15 years Complaints involving	Retain in school for the first six years Review for further retention in the case of contentious disputes Secure Disposal routine complaints	

			allegations relating to safeguarding or child protection Date of resolution of complaint + 40 years		
Annual Reports required by the Department for Education and Skills	No	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI 2002 No 1171	Date of report + 10 years		Transfer to Archives
Proposals for schools to become, or be established as Specialist Status schools	No		Current year + 3 years		Transfer to Archives

Head Teacher and Senior Management Team					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Logbooks of activity in the school maintained by the Head Teacher	Yes		Date of last entry in the book + a minimum of 6 years then reviews.		These could be of permanent historical value and should be offered to

					the County Archives Service if appropriate
Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	Yes		Date of the meeting + 3 years then review.	Secure Disposal	These could be of permanent historical value and should be offered to the County Archives Service if appropriate
Reports created by the Head Teacher or the Management Team	Yes		Date of the report + a minimum of 3 years then reviews.	Secure Disposal	These could be of permanent historical value and should be offered to the County Archives Service if appropriate
Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		Current academic year + 6 years then review	Secure Disposal	
Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		Date of correspondence + 3 years then review	Secure Disposal	
Professional Development Plans	Yes		Life of the plan + 6 years	Secure Disposal	
School Development Plans	No		Life of the plan + 3 years	Secure Disposal	
School Privacy Notice which is sent to Parents and Pupils	Yes		Until superseded + 6 years		

### Admissions Process

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
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All records relating to the creation and implementation of the School Admissions' Policy	No		Life of the policy + 3 years then review	Secure Disposal
Admissions – if the admission is successful	Yes		Date of Admission + 1 Year	Secure Disposal
Admissions – if the appeal is unsuccessful	Yes		Resolution of case + 1 year	Secure Disposal
Admissions Schools – Casual – if offer is accepted	Yes		Current Year + 1 Year	Secure Disposal
Admissions – Schools – Casual – if offer is declined	Yes		Retain for 3 months	Secure Disposal
Proof of address supplied by parents as part of the admissions process	Yes		Current year + 1 year	Secure Disposal
Supplementary Information form including additional information such as religion, medical conditions etc. <ul style="list-style-type: none"> <li>• For successful admissions</li> <li>• For unsuccessful admissions</li> </ul>	Yes			
			This information should be added to the pupil file	Secure Disposal
			Until appeals process completed	Secure Disposal
Register of Admissions	Yes		Every entry must be preserved for 3 years from the point of entry.	

### Operational Administration

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
General file series	No		Current year + 5 years then REVIEW	Secure Disposal
Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	Standard Disposal

Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	Standard Disposal
Newsletters and other items with a short operational use	No		Current year + 1 year	Standard Disposal
Visitors' Signing in Information: In the both Paper and Electronic Versions	Yes		Current year + 6 years then REVIEW	Secure Disposal
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	Secure Disposal

## Human Resources

This section deals with all matters of Human Resources management within the school.

Recruitment				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years	Secure Disposal
All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	Secure Disposal
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	Secure Disposal

			for 6 months	
Pre-employment vetting information – DBS Checks-successful candidates	No	DBS Update Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74	Application forms and references and other documents for the duration of the employee's employment + 6 years	
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	
Pre-employment vetting information – Evidence proving the right to work in the United Kingdom <sup>4</sup>	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 2 years	

<b>Operational Staff Management</b>				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years	Secure Disposal

Timesheets	Yes		Current year + 6 years	Secure Disposal
Annual appraisal/assessment records	Yes		Current year + 6 years	Secure Disposal
Staff Training-where training related to children (e.g. safeguarding or other child related training)	Yes		Date of Training + 40 years	
Staff Training-where training leads to Continuing professional development	Yes		Length of time required by the professional body	
Sickness and Absence Monitoring	Yes		Current Year + 3 Years	

<b>Management of Disciplinary and Grievance Processes</b>				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
Allegation of a child protection nature against a member of staff including where the allegation is Unfounded.	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	Secure Disposal
Disciplinary Proceedings	Yes			
<ul style="list-style-type: none"> <li>Oral warning</li> </ul>	Yes		Date of warning + 6 months	Secure Disposal
<ul style="list-style-type: none"> <li>Written warning – level 1</li> </ul>	Yes		Date of warning + 6 months	

• Written warning – level 2	Yes		Date of warning + 12 months	
• Final warning	Yes		Date of warning + 18 months	
• Case not found	Yes		If the incident is child protection related, then see above otherwise dispose of at the conclusion of the case	Secure Disposal

### Health and Safety

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
Health and Safety Policy Statements	No		Life of policy + 3 years	Secure Disposal
Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	Secure Disposal
Accident reporting records relating to those under or over the age of 18	Yes		On the provision that there is an Accident book in place: + 3 years from the last entry of the book.	Secure Disposal
Records relating to any reportable death injury, disease or dangerous occurrence. (RIDDOR)	Yes		Date of Incident +3 years, provided that all records relating to the incident are held in the individual's file.	Secure Disposal
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	Date of Incident + 40 years	Secure Disposal

		18 (2)		
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	Secure Disposal
Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	Secure Disposal
Fire Precautions logbooks	No		Current year + 3 years	Secure Disposal

<b>Payroll and Pensions</b>				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	Secure Disposal
National Insurance schedule of payments	Yes		Current Year + 6 years	
Income tax form P60	Yes		Current year + 6 years	
Absence Record	Yes		Current year + 3 years	
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	Secure Disposal

Pension Payroll	Yes	Taxes Management Act 1970, Income and Corporation Tax 1988	Termination of Employment + 15* years	
Pay Slips	Yes	Taxes Management Act 1970, Income and Corporation Tax 1988	Current year + 6 years	
Payroll and Payroll Reports	Yes	Taxes Management Act 1970, Income and Corporation Tax 1988	Current year + 6 years	
Insurance	Yes	Taxes Management Act 1970, Income and Corporation Tax 1988	Current year + 6 years	

\*on advice from the Hillingdon Council, McCloud/Sargeant judgement allowance.

## Financial Management of the School

This section deals with all aspects of the financial management of the school including the administration of school meals.

Risk Management and Insurance				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	Secure Disposal

Asset Management				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
Inventories of furniture and equipment	No		Current year + 6 years	Secure Disposal

Burglary, theft and vandalism report forms	No		Current year + 6 years	Secure Disposal
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<b>Accounts and Statements including Budget Management</b>				
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Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
Annual Accounts	No		Current year + 6 years	Secure Disposal
Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	Secure Disposal
Student Grant applications	Yes		Current year + 3 years	Secure Disposal
All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of the budget + 3 years	Secure Disposal
Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	Secure Disposal
Records relating to the collection and banking of monies	No		Current financial year + 6 years	Secure Disposal
Pupil Premium Fund Record	Yes	Limitations Act 1980	Date the pupil leaves the provision + 6 years	
Records relating to the identification and collection of debt	No		Current financial year + 6 years	Secure Disposal
Records Related to Gift Aid	No		Current financial year + 6 years	Secure Disposal

<b>Contract Management</b>
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Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	Secure Disposal
All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	Secure Disposal
Records relating to the monitoring of contracts	No		Current year + 6 years or 12 years	Secure Disposal

### School Fund

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
School Fund - Cheque books	No		Current year + 6 years	Secure Disposal
School Fund - Paying in books	No		Current year + 6 years	Secure Disposal
School Fund – Ledger	No		Current year + 6 years	Secure Disposal
School Fund – Invoices	No		Current year + 6 years	Secure Disposal
School Fund – Receipts	No		Current year + 6 years	Secure Disposal
School Fund – Bank Statements	No		Current year + 6 years	Secure Disposal

### School Meals Management

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
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Free School Meals Registers	Yes		Current year + 6 years	Secure Disposal
School Meals Registers	Yes		Current year + 3 years	Secure Disposal
School Meals Summary Sheets	No		Current year + 3 years	Secure Disposal

## Property Management

This section covers the management of buildings and property.

Property Management				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
Title deeds of properties belonging to the school	No		PERMANENT These should follow the property unless the property has been registered with the Land Registry	
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	
Leases of property leased by or to the school	No		Expiry of lease + 6 years	Secure Disposal
Records relating to the letting of school premises	No		Current financial year + 6 years	Secure Disposal

Maintenance				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record

All records relating to the maintenance of the school carried out by contractors	Yes		These should be retained whilst the building belongs to the school and should be passed to any new owners of the building is leased or sold.	Secure Disposal
All records relating to the maintenance of the school carried out by school employees including maintenance logbooks	Yes		These should be retained whilst the building belongs to the school and should be passed to any new owners of the building is leased or sold.	Secure Disposal

## Pupil Management

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

Pupil's Educational Record				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
Pupil's Educational Record	Yes	The Education (Pupil information) (England) Regulations 2005 SI 2005 No. 1437		
<ul style="list-style-type: none"> <li>Primary</li> </ul>			Retain while the child is a pupil at the School.	File should follow the pupil to their next location including Primary School, Secondary School or Secure Unit referral. If there is no next known location, then it

				should be held onto for DOB + 25 years.
<ul style="list-style-type: none"> <li>Secondary</li> </ul>		Limitation Act 1980 (Section 2)	Date of Birth of the pupil + 25 years	Secure Disposal
Examination Results – Pupil Copies	Yes			
<ul style="list-style-type: none"> <li>Public</li> </ul>			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.
<ul style="list-style-type: none"> <li>Internal</li> </ul>			This information should be added to the pupil file	
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.	Secure Disposal
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	Secure Disposal

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

## Attendance

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
Attendance Registers	Yes		Date of register + 3 years	Secure Disposal
Correspondence relating to authorised absence	Yes	Education Act 1996 Section 7	Current academic year + 2 years	Secure Disposal

### Special Educational Needs

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
Special Educational Needs files, reviews and Individual Education Plans	Yes	Children and Family's Act 2014 Special Educational Needs	Date of Birth of the pupil + 31 years	REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.
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 + 31 years [This would normally be retained on the pupil file]	Secure Disposal unless the document is subject to a legal hold
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 + 31 years [This would normally be retained on the pupil file]	Secure Disposal unless the document is subject to a legal hold
Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 31 years [This would normally be retained on the pupil file]	Secure Disposal unless the document is subject to a legal hold

