



Data Retention Policy

Prepared by
Date
To Be Reviewed

Alysha Doherty
15 July 2026
15 July 2029

1. Asset & Disposal Register

School purchases a wide variety of items of furniture, equipment, plant etc. It is essential, for the proper recording of these assets. In the event of a fire, theft or other such event, reference can then be made to the register which will aid insurance claims.

A full and accurate register showing the acquisition, location and eventual disposal of all items of furniture, equipment etc. The register must be updated continuously (i.e. as and when additions and disposals take place).

Regular checks will be carried out on an annual basis to ensure the existence and accurate recording of items on the register. The inventory record should be signed and dated to evidence this check.

2. Guidelines on Definition of Register Items

The register records all items such as furniture, fittings, equipment, plant/machinery and computer hardware and software purchased by school.

Items not purchased by school, e.g. leased, rented, donated, are also to be recorded on the register and details of the source noted within the Comments field.

Items from the categories above only need to be listed if they are portable and greater than £100 in value.

Desks, chairs and filing cabinets associated in and around a work station need not be listed.

Electrical and non-electrical items should be listed on the same register.

School have an electronic Asset and Disposal Register located at [P:\Office\Asset Register](#)

New items will be added to the register on receipt of the item. The items will be identified by the Purchase Order and Invoice recorded on Pastel. The Office staff will ensure that the register is updated.

Any items to be disposed off will be noted on the register at the time of the disposal, entering the relevant information onto the worksheet.

3. Security

Access to valuable equipment is to be closely controlled and its use restricted to authorised users only. Where practical, attractive items should be kept locked away when not in use/and overnight and keys should only be accessible to authorised staff.

All reasonable steps are to be taken to maximise protection of equipment. This should include all attractive and portable items, such as computers, cameras etc.

4. Safes

All safe keys must be removed from the premises overnight, otherwise the insurance is invalidated.

The details of all safes are required to be notified direct to the Insurance Section. A copy of the form can be found at Appendix 2 of this document.

5. Annual Physical Check of Items on the Register

A physical check will be undertaken on an annual basis of all items on the register. This will be carried out in collaboration with all staff members. The record should be signed and dated to evidence this check.

This check is only to confirm the details of the inventory items ie. that it is still in use, the location is still correct etc. It is not to check any electrical supply to the equipment and can therefore be carried out by staff without specialist knowledge.

Any discrepancies should be investigated and reported to the Headteacher/Deputy Headteacher.

6. Register Checks by Auditors

On any visit to an establishment, Internal Audit staff may request a copy of the register records and then carry out spot checks of equipment, machinery etc held at the establishment to ensure the completeness, accuracy and continuous updating of the records. (External audit may also carry out such checks).

7. Removal of Equipment from Premises

Items of equipment should not be removed from the premises without proper authority. When a piece of equipment is required to be taken off the premises, this should be appropriately recorded onto the Asset and Disposal Register, including the date of removal and the name of the person removing the item. The Register will then be updated when the item is returned.

All items which are sent away or collected from the establishment for repair or maintenance are also be recorded in this log record.

8. Disposal of Equipment

Obsolete equipment not only takes up space but potentially incurs on going maintenance costs. The school should therefore dispose of such equipment in line with the processes set out in this policy.

Items can be disposed if they are :-

- Not capable of running required operational software systems or being upgraded to do so;
- No longer required, due to changed procedures, functions or usage patterns;
- Beyond repair.

Assets identified for disposal can be disposed of using the following acceptable methods:-

- a) Sale of assets
- b) Donation of assets to a school or community service organisation
- c) Destroy / Recycle assets
- d) *Donation or Selling Items to Staff*

Choice of the most appropriate disposal option will be influenced by the age and functionality of the equipment for disposal and by market value.

- a) **The sale of assets** involves assigning a minimum price to the item and marketing the items for sale. Assets should be advertised as 'sold as seen' with no guarantee of lifespan given.

The minimum price should at least cover the costs connected to the disposal, for example those related to clearing data from PC's or laptops. Appropriate documentary evidence needs to be retained to allow income to be accounted for to the point of banking (receipts, paying in slips). All items should be in a good and safe condition. Electrical goods should only be sold if the portable appliance test (PAT) is in date. If when originally purchased the asset was subject to VAT then VAT must be charged on the agreed sale price and schools should indicate this as taxable income when paid into the main school budget.

Checklist for Disposal of Assets

- Seek necessary authorisation i.e. Headteacher / Governing Body
 - Remove the items from any outstanding maintenance arrangements
 - Retain appropriate records
 - Update the school inventory records
 - Ensure items are in a good and safe condition
 - Ensure PAT tests are in date for electrical appliances
- b) The school may authorise the **donation of equipment** to another organisation or school.
 - c) **Destroy / Recycle asset**, items with no market value and no use to any other organisation or person may be destroyed in an appropriate and safe manner. Items must be destroyed or recycled in accordance with legislation.

Items with no market value and no use to any other organisation or person may be destroyed in an appropriate and safe manner. Items must be destroyed or recycled in

accordance with legislation. Advice on how to destroy or recycle assets can be obtained from Operational Services.

It is essential to ensure that any computer and laptop hard drive / memory / data store is professionally cleared of such data prior to disposal. This is to ensure that the school adheres to data protection legislation and minimises the risk that sensitive information is exposed to unauthorised individuals.

School also have contact with Asset-Remarketing <https://www.asset-remarketing.co.uk/> who provide an IT disposal/recycle asset services.

- d) **Donation or Selling Items to Staff**, when offering items to staff, school must follow the Council's Code of Conduct which lays down guidelines on how schools and individual members of staff should avoid any impropriety or any suspicion of improper conduct. Need to ensure that all staff have the opportunity to see what may be available. In addition consideration should be given to allocating equipment via a lottery if there are more interested parties than items available.

DOCUMENT RETENTION

9. INTRODUCTION

- 9.1. The main aim of this policy is to enable St Mary's primary school to manage records effectively and in compliance with data protection and other regulation. As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.
- 9.2. St Mary's are committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.
- 9.3. The table below sets out the main categories of information that we hold, the length of time that we intend to hold them and the reason for this.
- 9.4. For information, the Document Retention Period table includes the legal requirements for certain categories of document. Where we have decided to keep information longer than the statutory requirement, this has been explained in the table.
- 9.5. Section 3 of this policy sets out the destruction procedure for documents at the end of their retention period. The Business Manager shall be responsible for ensuring that this is carried out appropriately, and any questions regarding this policy should be referred to them.
- 9.6. 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 Business Manager, who will make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.

10. DOCUMENT RETENTION PERIOD

DOCUMENT TYPE	LEGISLATION / REASONS FOR RETENTION	RETENTION PERIOD	STAFF LEAD
CONSTITUTIONAL			
Principal (signed) minutes of Governors' meetings	Companies Act 2006 Charities Act 2011	Permanent	Clerk to the Governors
Documents of clear historical / archival significance	Data Protection regulation	Permanent if relevant data protection regulation provisions are met.	Headteacher
Contracts e.g. with suppliers or grant makers	Limitation Act 1980	Length of contract term plus 6 years	School Business Manager
Contracts executed as deeds	Limitation Act 1980	Length of contract term plus 12 years	School Business Manager
IP records and legal files re provision of service	Limitation Act 1980	Life of service provision or IP plus 6 years	Headteacher
TAX AND FINANCE			
Annual accounts and review (including transferred records on amalgamation)	Companies Act 2006 Charities Act 2011	Current year plus 6 years	School Business Manager
Tax and accounting records	Finance Act 1998 Taxes Management Act 1970	6 years from end of relevant tax year	School Business Manager

Information relevant for VAT purposes	Finance Act 1998 and HMRC Notice 700/21	Minimum 6 years from end of relevant period	School Business Manager
Banking records / receipts book/sales ledger	Companies Act 2006 Charities Act 2011	6 years from transaction	School Business Manager
EMPLOYEE / ADMINISTRATION			
See generally ICO Employment Practices Code			

Payroll / Employee / Income Tax and NI records: P45; P6; P11D; P60, etc.	Taxes Management Act 1970 / IT (PAYE) Regulations	Where the records is held by school, this will be 6 years from end of current year However, records are maintained by Payroll / HR	School Business Manager
Maternity pay	Statutory Maternity Pay Regulations	3 years after the end of the tax year. Payroll element 6 years from end of current year.	School Business Manager
Sick pay	Statutory Sick Pay (General) Regulations	3 years after the end of the tax year. Payroll element 6 years from end of current year.	School Business Manager
National Minimum wage records	National Minimum Wage Act	3 years after the end of the tax year	School Business Manager
Foreign national ID documents	Immigration (Restrictions on Employment) Order 2007	Minimum 2 years from end of employment	School Business Manager
HR files and training records	Limitation Act 1970 and Data Protection regulation	Maximum 6 years from end of employment	School Business Manager

Records re working time	Working Time Regulations 1998 as amended	2 years	School Business Manager
Job applications (CVs and related materials re unsuccessful applicants)	ICO Employment Practices Code (Recruitment & Selection) Disability Discrimination Act 1995 & Race Relations Act 1976	6-12 months from your notification of outcome of application	School Business Manager

Pre-employment / volunteer vetting	ICO Employment Practice Code	6 months	School Business Manager
Disclosure & Barring Service checks	Single Central Record Requirements under for maintained schools: Regulations 12(7) and 24(7) and Schedule 2 to the School Staffing (England) Regulations 2009 and the School Staffing (England) (Amendment)	Record only satisfactory / unsatisfactory result and delete other information. If copy is kept, not to be retained beyond 6 months See further DfE statutory Guidance ' Working Together to safeguard children' https://www.gov.uk/government/publications/working-togetherto-safeguard-children--2	School Business Manager
Volunteer records		Maximum 6 years from end of volunteering	School Business Manager

INSURANCE			
Employer's Liability Insurance	Employers' Liability (Compulsory Insurance Regulation) 1998	40 years	School Business Manager
Policies	Commercial	3 years after lapse	School Business Manager
Claims correspondence	Commercial	3 years after settlement	School Business Manager
HEALTH & SAFETY / MEDICAL			

General records	Limitation Act 1970	Minimum 3 years	Headteacher
Records re work with hazardous substances	Control of Hazardous Substances to Health Regulations 2002	Up to 40 years.	Headteacher
Accident books / records and reports	RIDDOR Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995	3 years after the child reaches the age of 18	Headteacher

PREMISES / PROPERTY			
Original title deeds		Held with the Diocese of Salford	N/A
3 rd Party Leases	Limitation Act 1980	12 years after lease has expired	School Business Manager
Building records, plans, consents and certification and warranties etc	Limitations Act 1980	6 years after disposal or permanent if of historical / archival interest. Carry out review re: longer retention, e.g. if possible actions against contractors. All major building works records are stored indefinitely in case of possible actions.	School Business Manager
PENSION RECORDS	For all categories see:	All pension records are held by either the Local Government pension Scheme of the Teachers' Pension Scheme.	
Records about employees and			

workers	Detailed Guidance for Employers: (April 2017) pensions regulator.gov.uk	
Records re the Scheme		
Records re active members and opt in / opt out		
Trust Deed / Rules and HMRC approvals		
Trustees' Minutes and annual accounts		
Policies including investment policies		

PUPILS			
Educational Record	Pupil information Regulations 2005 (maintained schools only) Data Protection regulation	7 years unless below: (Exceptional Circumstances) 25 years from date of birth if this is the final school of the child but the pupil file should follow the pupil so it is likely to be difficult to justify the need for retention once the file has been passed to the pupil's new school	School Business Manager
Child Protection information (on child's file)	"Keeping children safe in education Statutory guidance for schools and colleges September 2020"; "Working together to safeguard children. A guide to interagency working to safeguard and promote the welfare of children February 2017"	Recorded on CPOMS and former paper records RETAIN UNTIL FURTHER RECOMMENDATIONS Subject to moratorium on destruction due to historic child abuse enquiry. See https://www.iicsa.org.uk/document/guidance-note-retentioninstructions-and-dataprotection-requirements	Designated Safeguarding Lead

Child Protection Information in other files	“Keeping children safe in education Statutory guidance for schools and colleges September 2020”; “Working together to safeguard children. A guide to interagency working to safeguard and promote the welfare of children February 2017”	Recorded on CPOMS and former paper records RETAIN UNTIL FURTHER RECOMMENDATIONS Subject to moratorium on destruction due to historic child abuse enquiry. See https://www.iicsa.org.uk/document/guidance-note-retentioninstructions-and-dataprotection-requirements	Designated Safeguarding Lead
Special Educational needs			
SEN files	Limitation Act 1980	25 years from date of birth if this is the final school of the child but the pupil file should follow the pupil so it is likely to be difficult to justify the need for retention once the file has been passed to the pupil’s new school	SENDCo
Education Health and Care Plans	Special Educational Needs and Disability Regulations	25 years from date of birth if this is the final school of the child but the pupil file should follow the pupil so it is likely to be difficult to justify the need for	SENDCo
	2014 Children and families Act 2014, part 3	retention once the file has been passed to the pupil’s new school	

Statements of Special Educational Needs (now historic)	Originally under Special Educational Needs and Disability Regulations 2001	7 years unless below: 25 years from date of birth if this is the final school of the child but the pupil file should follow the pupil so it is likely to be difficult to justify the need for retention once the file has been passed to the pupil's new school	SENDCo
Attendance registers	Pupil Registration Regulations 2006 Regulation 14	Data held on SIMS 3 years from when the register entry was made if made in paper registers For computerised registers retain until 3 years after the end of the school year during which the entry was made. This applies to every back up copy.	School Business Manager
Other items e.g. curriculum related, photographs, video recordings	Case by case basis	Curriculum related: up to 6 months following submission to examination boards. Leavers' photographs: Permanent. Team photographs: as required for maintaining the archive. Otherwise subject to case by case justification.	Headteacher
PARENTS	Pupil Registration Regulations 2006 For basic name and contact details. Otherwise usually operational in accordance with the statutory functions of the school	Data held on SIMS For the duration that the parent has a pupil at the school. Otherwise subject to case by case justification.	School Business Manager

OTHER SCHOOL RELATED INFORMATION	various	Biometric scan prints: for the duration the pupil is at the school. CCTV Recordings: Up to 1 week. Available on the school server for 30 days. Sponsorship partners: Current year plus 6 years.	School Business Manager
---	---------	--	-------------------------

11. DELETION OF DOCUMENTS

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

Confidential waste

11.2. Documents to be shredded by the user using the shredders located around the school.

11.3. Anything that contains personal information should be treated as confidential.

11.4. Where deleting electronically, please ensure that this is carried out in line with this Policy,.

Other documentation

11.5. Other documentation can be deleted or shredded by the user.

Individual responsibility

11.6. Much of the retention will be automatic, but when faced with a decision about an individual document, you should ask yourself the following:

11.6.1. Has the information come to the end of its useful life?

11.6.2. Is there a legal requirement to keep this information or document for a set period?
(Refer to Appendix 1 for more information)

11.6.3. Would the information be likely to be needed in the case of any legal proceedings?
In particular, is it potentially relevant to an historic child abuse enquiry? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)

11.6.4. Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?

11.6.5. Is the document of historic or statistical significance?

APPENDIX 1

Asset and Disposal Register located at [P:\Office\Asset Register](#)

Description	Type	Location	Serial Number	Date of Purchase	Purchase Price	Guarantee / Warranty In Place	Guarantee / Warranty Expiry Date	Comments	Disposal Date	Proceed from Sale	Disposal Note
Ipad Mini	IT / Electrical	Office	DLXN6BPXFCM5	18/11/2015					20/04/2021		Broken, uneconomical to repair
HP Laptop	IT / Electrical	Office	SN0CND736466K	01/01/2018					20/04/2021		Missing keys and typing on its own Broken, uneconomical to repair
Verg PC Note Book Computer	IT / Electrical	Class 9 - Carmel Bogcott	Verg PC Note Book Computer	01/01/2014					20/04/2021		Unable to be fixed Broken, uneconomical to repair
Epson Data Projector	IT / Electrical	Office		18/11/2015					20/04/2021		No longer used by school
E10 Laptop - number 58	IT / Electrical	Class 10 - Emma Thomas	S/NZ0126940G	01/04/2021	DFE						
E10 Laptop - number 59	IT / Electrical	Class 10 - Emma Thomas	S/NZ0127047G	01/04/2021	DFE						

APPENDIX 2

Please complete for each safe

Location (full address with postcode)	
Make	
Model	
Serial number	
Contents including maximum value of cash at any one time	
How often is the safe emptied?	
Details of key procedures	
Details of personnel with key access	

Thank you for completing this form.

Please return via email to insurancesection@rochdale.gov.uk