



Records Management Policy



Reviewed: August 2024

Responsible Committee	Audit & Risk
Linked Policies	Data Protection Policy Information Security Policy Privacy Notices Acceptable Use Policies and Online Safety
Next Review	August 2026
Target Audience	All Stakeholders
Dissemination	Trust Policies Shared Drive Trust Website.

Version	Section	Updates	Date	Author
1.0		Refreshed policy using new Veritau template. Replaced 22-24 policy.	August 2024	Data Protection Officer & Trust IT Lead

Introduction and Scope

White Woods Primary Academy Trust recognises records management as a core corporate function that supports the effective management of the Trust. A records management programme ensures that authoritative evidence of our work is created, captured, managed and made accessible within the scope of our information governance policy framework. This allows for improved accountability, transparency, continuity, decision-making, and better compliance with relevant legislation and regulations, as well as protecting the rights and interests of ourselves and our pupils.

A record is defined as information created, received and maintained as evidence and as an asset by the school in pursuit of legal obligations or in the transaction of business. Records are retained as evidence for a set period determined by legal, regulatory and functional requirements.

The Records Management policy and retention schedule applies to all records created, received or maintained by the Trust in the course of carrying out its functions, regardless of whether it is in paper or electronic format.

This policy applies to all employees, governors or Trustees, contractors, agents and representatives, volunteers and temporary staff working for, or on behalf of, the school. It should be read alongside the other policies within our information governance policy framework, including the Data Protection policy, Information Security policy and Acceptable Use policies.

Roles and Responsibilities

Overall responsibility for ensuring that the school meets the statutory requirements of any legislation lies with the Board of Governors or Trustees. The following roles have day to day responsibility for records management compliance and provide the necessary assurance to the Board.

Senior Information Risk Owner (SIRO)

The SIRO is responsible for overseeing the implementation of this policy and ensuring that effective records management practices are in place across the school. They are ultimately responsible for the day-to-day operational management of the school and will ensure that staff are appropriately trained in relation to records management, supported by the SPOC and IAOs. In our organisation this role lies with the CEO.

Single Point of Contact (SPOC)

The SPOC will support the SIRO in the day-to-day operational management of the school, providing guidance on good records management practices and promoting compliance with this policy so that information can be retrieved easily, appropriately and in a timely way. They will help develop and carry out regular reviews of the records management programme, at least annually, to ensure compliance and to check that records are stored securely and can be accessed appropriately. In our organisation this role lies with the School Administrator or Office Manager at school level and the Trust IT Lead at Trust level.

Information Asset Owner (IAO)

The IAO is responsible for the security and maintenance of a particular record during its lifecycle. They need to understand how information is created, amended or added to over time, and know who has access to the records and why. They are responsible for the appropriate disposal of information when it is no longer required. A record of IAOs is included in our Information Asset Register.

All staff

All staff, including governors or Trustees, contractors, agents and representatives, volunteers and temporary staff working for, or on behalf of, the school are responsible for managing records consistently in accordance with this policy. They must keep complete and accurate records which adequately document their work.

Records Management

We have a robust programme in place for managing our records throughout their lifecycle. This includes using methods such as version control and file plans to ensure that records can be easily searched and accessed in the event of an information request. We also include records and information management as a risk on our corporate risk register.

Information Asset Register (IAR)

In accordance with Article 30 of UK GDPR, we have in place an Information Asset Register (IAR) which maintains a record of our processing activities. The IAR documents exactly what records we hold, where they are stored, who has access to the information and the retention periods in place. This is reviewed, at least annually, to ensure it remains accurate.

Email management

We have a process in place to ensure that emails are also managed in line with this policy and our retention schedule. Emails discussing school business or reflecting significant actions or decisions concerning school business will not be stored in personal email inboxes but will be removed and stored securely in the appropriate filing system.

Personal email inboxes are regularly reviewed by staff to ensure any unnecessary emails are deleted.

Pupil Records

Schools are under a duty to maintain a record for each pupil which serves as the core record of an individual's progress through the education system and should accompany them throughout their school career. The information within the pupil record must be

easy to find, accurately and objectively recorded, and expressed in a professional manner.

Pupil records are held electronically within our management information system (MIS). Some information, not forming part of the core record, will be held outside the MIS in either electronic or paper format. This includes information which has shorter retention periods such as attendance registers, consent forms, medical forms, accident forms, absence notes and pupil work.

Safeguarding files

Records relating to pupils involved with child protection or safeguarding are held securely in a designated system accessible to the Designated Safeguarding Leads (DSLs). This is stored separately to the core pupil record to ensure confidentiality and restricted accessibility.

Staff Records

Records relating to the school workforce will be held securely, either electronically or in paper format, with appropriate measures in place to ensure accessibility is restricted.

Storage and Security

All records, especially where containing personal data, will be stored securely to maintain confidentiality, whilst also keeping information accessible to those authorised to see it. Electronic records will have appropriate security and access controls in place, and systems will have robust audit functions in place wherever possible.

Paper records will be stored in secure, lockable storage areas with restricted access.

When sharing or transferring records containing personal information, we will ensure appropriate transmission security controls are in place, in line with our Information Security Policy.

Retention and Disposal

Retention is the period a record is kept for after it stops being actively used, but before it is destroyed. Retention is a vital part of records management as it allows organisations to retain records only for as long as needed, and discourages records being kept for long periods 'just in case'.

The retention period for particular types of records is determined by legal, regulatory or functional requirements. We have implemented a Retention Schedule which sets out our specified retention periods (Appendix One).

We will ensure that any records containing personal or confidential information are disposed of appropriately and securely when they have reached the end of their retention period, in line with our retention schedule.

Records held in databases or electronic management systems with the functionality for automatic destruction of records after a specified period of time will be used wherever possible. A review of the records will be carried out prior to destruction, where practical.

Where automatic disposal is not in place, for example for paper records, we will carry out a manual review, at least annually, to ensure they are deleted in line with retention guidelines.

The disposal of all information is documented to ensure that we maintain a record of when it has been deleted and by whom. This allows us to evidence that a record no longer exists, or has been transferred to another institution, in the event of a subject access or Freedom of Information request being received.

Archiving

A small percentage of our records may be selected for permanent preservation as part of the County or Local Authority Archives Service. This is maintained as a resource to help inspire and equip current staff and pupils to understand and appreciate issues of identity, belonging and shared heritage; to prompt memories of school-life among many generations; and to serve as a research resource for all interested in the history of the school and the community it serves.

Records containing personal information will only be selected for archive with appropriate safeguards in place to protect the rights and freedoms of individuals. This will include anonymisation or pseudonymisation wherever possible.

Training

Since all employees are involved in creating, maintaining and using records, it is vital that everyone understands their record management responsibilities as set out in this policy. We will ensure that staff are appropriately trained or experienced and that they understand the need for effective record keeping.

When we introduce new technology or ICT systems we ensure that users are appropriately trained to use these systems and can manage records within them effectively.

Appendix One – Retention Schedule

1. Governance, Funding and Financial Management of the Academy Trust

Academies are governed by the Academy Trust, which will usually be a company limited by guarantee³. The Academy Trust may also be a charitable trust.

1.1 Governance of the Academy Trust					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrativelife of the record
1.1.1	Governance Statement	No		Life of governance statement + 6 years One copy of each iteration may need to be retained for archive purposes.	SECURE DISPOSAL
1.1.2	Articles of Association	No		Life of the Academy	
1.1.3	Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL
1.1.4	Memorandum of Understanding of Shared Governance among Schools	No	<i>Companies Act 2006 section 355</i>	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL
1.1.5	Constitution	No		Date constitution superseded + 10 years. It may be appropriate to retain one copy of each constitution for archival purposes.	
1.1.6	Special Resolutions to amend the Constitution	No		Date constitution superseded + 10 years. It may be appropriate to retain one copy of each constitution for archival purposes.	

1.1.7	Written Scheme of Delegation	No	<i>Companies Act 2006 section 355</i>	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL
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³ A **company limited by guarantee** does not usually have a share capital or shareholders, but instead has members who act as guarantors. The guarantors give an undertaking to contribute a nominal amount (typically very small) in the event of winding up of the **company**. In the case of an Academy, the guarantors will guarantee the sum of £10 each.

1.1 Governance of the Academy Trust

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrativelife of the record
1.1.8	Directors – Appointment	No		Life of appointment + 6years	SECURE DISPOSAL
1.1.9	Directors – Disqualification	No	Company Directors Disqualification Act1986	Date of disqualification +15 years	SECURE DISPOSAL
1.1.10	Directors – Termination ofOffice	No		Date of termination + 6years	SECURE DISPOSAL
1.1.11	Annual Report – TrusteesReport	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.12	Annual Report and Accounts	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.13	Annual Return	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.14	Appointment of Trusteesand Governors and Directors	Yes		Life of appointment + 6years	SECURE DISPOSAL
1.1.15	Statement of Trustees Responsibilities	No		Life of statement + 6years	SECURE DISPOSAL
1.1.16	Appointment and removalof Members	No		Life of appointment + 6years	SECURE DISPOSAL
1.1.17	Strategic Review	No		Life of the review or until review superseded + 3 years. If major changes are made to the review then an archive copy of previous review should be retained.	SECURE DISPOSAL

1.1 Governance of the Academy Trust

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.1.18	Strategic Plan [also known as School Development Plans]	No		Life of plan or until plan superseded + 3 years. If major changes are made to the plan then an archive copy of previous plans should be retained.	SECURE DISPOSAL
1.1.19	Accessibility Plan	There may be if the plan refers to specific pupils	Limitation Act 1980 (Section 2)	Life of plan or until plan superseded + 3 years then review. If major changes are made to the plan then an archive copy of previous policies should be retained.	SECURE DISPOSAL

1.2 Board of Directors, Members Meetings and Governing Body					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	Board of Directors				
1.2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.2	Board Decisions	Could be if the decisions refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.3	Board Meeting: Annual Schedule of Business	No		Current year	SECURE DISPOSAL
1.2.4	Board Meeting: Procedures for conduct of meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	SECURE DISPOSAL
	Committees⁴				
1.2.5	Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
	General Members' Meeting				

⁴ The board can establish any committee and determine the constitution, membership and proceedings that will apply.

1.2 Board of Directors, Members Meetings and Governing Body					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting ⁵	OFFER TO ARCHIVES
1.2.7	Records relating to the management of the Annual General Meeting ⁶	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting ⁷	OFFER TO ARCHIVES
	Governors				
1.2.8	Agendas for Governing Body meetings	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	SECURE DISPOSAL ⁸

⁵The signed minutes must be kept securely together with the notice and agenda for the meeting and supporting documentation provided for consideration at the meeting. Documentation is generally filed in a dedicated minute book, which is usually in the form of a loose-leaf binder to which additional pages can be easily added.

⁶Not all Academies are required to hold an Annual General Meeting for the Members – the requirement will be stated in the Constitution.

⁷The signed minutes must be kept securely together with the notice and agenda for the meeting and any supporting documentation provided for consideration at the meeting. Documentation is generally filed in a dedicated minute book, which is usually in the form of a loose-leaf binder to which additional pages can be easily added.

⁸In this context, SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross-cut shredder.

1.2 Board of Directors, Members Meetings and Governing Body					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.9	Minutes of, and papers considered at, meetings of the Governing Body and its committees	May be data protection issues, if the meeting is dealing with confidential issues relating to staff			
	Principal Set (signed)			Principal set (signed) – date of meeting + 10 years.	
	Inspection Copies ⁹			Inspection copies – date of meeting + 10 years	SECURE DISPOSAL
1.2.10	Reports presented to the Governing Body	May be data protection issues, if the report deals with confidential issues relating to staff		Date of the meeting the report was presented + 10 years	SECURE DISPOSAL or retain with the signed set of minutes

⁹ These are the copies which the clerk to the Governor may wish to retain, so that requestors can view all the relevant information, without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

1.2 Board of Directors, Members Meetings and Governing Body

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.11	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	SECURE DISPOSAL
1.2.12	Trusts and Endowments managed by the Governing Body	No		Life of the trust or endowment + 6 years	
1.2.13	Records relating to complaints dealt with by the Governing Body	Yes		Date complaint resolved + 3 years then review. If the complaint relates to negligence or safeguarding then date the complaint resolved + 15 years. If the complaint relates to child sexual abuse then the complaint resolved + 75 years (this retention period will be reviewed once the government and the ICO have issued guidance about the implementation of the IICSA recommendations).	SECURE DISPOSAL

1.2 Board of Directors, Members Meetings and Governing Body

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.14	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	SECURE DISPOSAL
	Statutory Registers¹⁰				
1.2.15	Register of Directors		Companies Act 2006	Date director resigns + 10 years.	SECURE DISPOSAL
1.2.16	Register of Directors' interests [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.17	Register of Directors' residential addresses		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.18	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.19	Register of members		Companies Act 2006	Date member resigns + 10 years.	SECURE DISPOSAL
1.2.20	Register of secretaries		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL

¹⁰ Academies are required by law to keep specific records, collectively known as statutory registers or the statutory books. The registers record information relating to the Academy's operations and structure, such as the current directors. Records should be kept up-to-date to reflect any changes that take place.

1.2 Board of Directors, Members Meetings and Governing Body

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.21	Register of Trustees interests			Date trustee resigns + 10 years	SECURE DISPOSAL
1.2.22	Declaration of Interests Statements [Governors] [this is not a statutory register]			Date governor resigns + 10 years.	SECURE DISPOSAL

1.3 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	Strategic Finance				
1.3.1	Statement of financial activities for the year	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.2	Financial planning	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.3	Value for money statement	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.4	Records relating to the management of VAT	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.5	Whole of government accounts returns	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.6	Borrowing powers	No		Until superseded + 6 years	SECURE DISPOSAL
1.3.7	Budget plan	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.8	Charging and remissions policy	No		Date policy superseded + 3 years	SECURE DISPOSAL
	Audit Arrangements				
1.3.9	Audit Committee and appointment of responsible officers	No		As long as necessary.	SECURE DISPOSAL
1.3.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	SECURE DISPOSAL
1.3.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	SECURE DISPOSAL

1.3 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	Funding Agreements				
1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements ¹¹	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.13	Funding Agreement – Termination of the funding agreement ¹²			Date of last payment of funding + 6 years NOTE: Either party may give not less than 7 financial years written notice to terminate the Agreement, such notice to expire on 31 August. Or, where the Academy has significant financial issues or is insolvent, the Agreement can be terminated by the Secretary of State to take effect on the date of the notice.	SECURE DISPOSAL
1.3.14	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.15	Funding Records – Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.16	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.17	Per pupil funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL

1.3.18	Exclusions agreement ¹³	No		<p>Date of last payment of funding + 6 years</p> <p>Note: The academy can enter into an arrangement with a local authority (LA), so that payment will flow between the academy and the LA, in the same way as it would do were the academy a maintained school.</p>	SECURE DISPOSAL
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¹¹ Where there is multi-Academy governance.

¹² Either party may give not less than 7 financial years' written notice to terminate the Agreement, such notice to expire on 31 August. Or, where the Academy has significant financial issues or is insolvent, the Agreement can be terminated by the Secretary of State to take effect on the date of the notice.

¹³ The Academy can enter into an arrangement with a Local Authority (LA), so that payment will flow between the Academy and the LA, in the same way as it would do were the Academy a maintained school.

1.3 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.19	Funding records ¹⁴	No		Date of last payment of funding + 6 years NOTE: Funding agreement which says that the academy can receive donations and can only charge where the law allows maintained schools to charge [see Charging and Remission Policy].	SECURE DISPOSAL
1.3.20	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.21	Records relating to loans	No		Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	SECURE DISPOSAL
	Payroll and Pensions				
1.3.22	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL

¹⁴ Funding agreement which says that the Academy can receive donations and can only charge where the law allows maintained schools to charge [see Charging and Remission Policy].

1.3 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.23	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995(SI 1995/3103)	From the end of the year in which the accounts were signed for a minimum of 6 years	SECURE DISPOSAL
1.3.24	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.25	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.26	Payroll records	Yes		Date payroll run + 6 years	SECURE DISPOSAL
Risk Management and Insurance					
1.3.27	Insurance policies	No		Date the policy expires + 6 years except public liability insurance - day of issue + 40 years. EXPLANATORY NOTE (This note is not part of the Regulations) These Regulations amend the Employers' Liability (Compulsory	SECURE DISPOSAL

				<p>Insurance) Regulations 1998 (the 1998 Regulations). Regulation 2(1) omits paragraphs (4) and (5) from regulation 4 of the 1998 Regulations. Paragraph (4) required an employer to retain a copy of its employer liability insurance certificate for 40 years. Paragraph (5) was a consequential provision to paragraph (4), providing for the retention of certificates, and is therefore also being omitted. Paragraph (3) substitutes paragraphs (1) and (2) of regulation 5 of the 1998 Regulations. Under the new provisions, the requirements for the display of the certificate will be satisfied if the certificate is made available in electronic form and is reasonably accessible to the relevant employees.</p>	
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				Paragraph (4) makes a consequential amendment to regulation 6(b) of the 1998 Regulations.	
1.3.28	Records relating to the settlement of insurance claims	No		Date claim settled + 6years	SECURE DISPOSAL
1.3.29	Employer's Liability Insurance Certificate	No		<p>Year of issue + 40 years. Pass to the local authority if the school closes.</p> <p>Also detailed notes - EXPLANATORY NOTE (This note is not part of the Regulations) These Regulations amend the Employers' Liability (Compulsory Insurance) Regulations 1998 (the 1998 Regulations). Regulation 2(1) omits paragraphs (4) and (5) from regulation 4 of the 1998 Regulations. Paragraph (4) required an employer to retain a copy of its employer liability insurance certificate for 40 years. Paragraph (5) was a consequential provision to paragraph (4), providing for the retention of certificates, and is therefore also being omitted. Paragraph (3) substitutes paragraphs (1) and (2) of regulation 5 of the 1998 Regulations. Under the new provisions, the requirements for the display of the certificate will be satisfied if the certificate is made</p>	SECURE DISPOSAL

				available in electronic form and is reasonably accessible to the relevant employees. Paragraph (4) makes a consequential amendment to regulation 6(b) of the 1998 Regulations.	
	Endowment Funds and Investments				
1.3.30	Investment policies	No		Life of the investment + 6 years	SECURE DISPOSAL

1.3 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.31	Management of Endowment Funds	No		Life of the fund + 6years	
	Accounts and Statements				
1.3.32	Annual accounts	No		Current year + 6years	STANDARD DISPOSAL
1.3.33	Loans and grants managed by the school	No		Date of last payment on loan + 6 years if the loan is under 10,000 or date of last payment on loan + 12 years if the loan is over 10,000.	SECURE DISPOSAL
1.3.34	Student Grant applications	Yes		Current year + 3years	SECURE DISPOSAL
1.3.35	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No		Life of the budget + 3years	SECURE DISPOSAL
1.3.36	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.37	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL

1.3 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.38	Records relating to the identification and collection of debt	No		Final payment of debt + 6 years.	SECURE DISPOSAL
	Contract Management				
1.3.39	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years or end of contract + 12 years, whichever is the longer.	SECURE DISPOSAL
1.3.40	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years or end of contract + 6 years whichever is the longer.	SECURE DISPOSAL
1.3.41	Records relating to the monitoring of contracts	No		End of the contract or until the final payment has been made whichever is the longer.	SECURE DISPOSAL
	Asset Management				
1.3.42	Inventories of furniture and equipment	No		Life of equipment + 6 years. Equipment will have write-down value over several years - the time depending on the type of equipment.	SECURE DISPOSAL
1.3.43	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL

1.3.44	Records relating to the leasing of shared facilities, such as sports centres	No		End of lease + 6 years.	SECURE DISPOSAL
1.3.45	Land and building valuations	No		Date valuation superseded + 6 years	SECURE DISPOSAL

1.3 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.46	Disposal of assets	No		Date asset disposed of + 6 years	SECURE DISPOSAL
1.3.47	Community School leases for land	No		Date lease expires +6 years	SECURE DISPOSAL
1.3.48	Commercial transfer arrangements	No		Date of transfer + 6 years	SECURE DISPOSAL
1.3.49	Transfer of land to the Academy Trust	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL
1.3.50	Transfers of freehold land	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL
	School Fund				
1.3.51	School Fund – Cheque books	No		Current financial year + 1 Year.	SECURE DISPOSAL
1.3.52	School Fund – Paying in books	No		Current year + 6 years	SECURE DISPOSAL
1.3.53	School Fund – Ledger	No		Current year + 6 years	SECURE DISPOSAL
1.3.54	School Fund – Invoices	No		Current year + 6 years	SECURE DISPOSAL
1.3.55	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
1.3.56	School Fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.57	School Fund – Journey books	No		Current year + 6years	SECURE DISPOSAL
	School Meals¹⁵				
1.3.58	Free school meals registers	Yes		Current financial year + 3 years.	SECURE DISPOSAL
1.3.59	School meals registers	Yes		Current year + 3years	SECURE DISPOSAL
1.3.60	School meals summary sheets	No		Current year + 3years	SECURE DISPOSAL

As a charity, an Academy is not permitted to trade and make a profit. It is, however, possible to set up a subsidiary trading company, which cancell products or services and Gift Aid profits back to the Academy. If the Academy operates a subsidiary company, it is expected that these records will be managed in line with standard business practice.

1.4 Policies, Frameworks and Overarching Requirements					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.4.1	Data Protection Policy, including dataprotection notification	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	SECURE DISPOSAL
1.4.2	Freedom of Information Policy	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	SECURE DISPOSAL

¹⁵ Unless it would be unreasonable to do so, school lunches should be provided when they are requested by, or on behalf of, any pupil. A school lunch must be provided free of charge to any pupil entitled to free school lunches. From September 2014, free school lunches must be provided to all KS1 pupils.

1.4 Policies, Frameworks and Overarching Requirements					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of therecord
1.4.3	Information Security Breach Policy	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	SECURE DISPOSAL
1.4.4	Special Educational Needs Policy	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	SECURE DISPOSAL
1.4.5	Complaints Policy	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	SECURE DISPOSAL
1.4.6	Risk and Control Framework	No		Life of the framework or framework superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	SECURE DISPOSAL
1.4.7	Rules and Bylaws	No		Life of rules or bylaws or rules or bylaws superseded + 3 years. If major changes are made to the rules or bylaws then an archive copy of previous policies should be retained	SECURE DISPOSAL
1.4.9	Home School Agreements ¹⁶	No		Life of the policy or policy superseded + 3	SECURE DISPOSAL

				years. If major changes are made to the policy then an archive copy of previous policies should be retained	
1.4.10	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6years	SECURE DISPOSAL

¹⁶ This should be drawn up in consultation with parents and should apply to all pupils.

2. Human Resources

2.1 Recruitment ¹⁷					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes		Date of appointment + 6 years Academies do not necessarily have to employ people with qualified teacher status; only the SEN and designated LAC teacher must be qualified.	SECURE DISPOSAL
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	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks ¹⁸	No	DBS Update Service Employer Guide June 2014	Schools do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record. When a school chooses to retain a copy, there should be a valid reason for doing so and it should not be kept for longer than six months. When the information is destroyed, it must be done securely. Once a recruitment (or other relevant) decision has been made, we do not keep certificate information (e.g. DBS number) for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints, or be for the purpose of completing safeguarding audits. If the school disposes of the certificate the following information should be retained	SECURE DISPOSAL

				<p>in line with the DBS Code of Practice: Retain the following after the certificate is destroyed -</p> <ol style="list-style-type: none"> 1. The date of issue of a disclosure; 2. The name of the subject; 3. The type of the disclosure requested; the position for which the Disclosure was requested; 4. The unique reference number of the Disclosure; 5. The details of the recruitment decision taken. <p>NOTE: Academies are bound by the legislation that applies to independent schools NOT maintained schools.</p>	
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		<p>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 added to the Staff Personal File</p>	SECURE DISPOSAL

¹⁷ Academies do not necessarily have to employ people with qualified teacher status; only the SEN and designated LAC teacher must be qualified.

¹⁸ Academies are bound by the legislation that applies to independent schools NOT maintained schools.

2.1 Recruitment ¹⁷					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ¹⁹	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, 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	SECURE DISPOSAL
2.1.7	Records relating to the employment of overseas teachers	Yes		Where possible, these documents should be added to the Staff Personal File, 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	SECURE DISPOSAL
2.1.8	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL

¹⁹ Employers are required to take a "clear copy" of the documents which they are shown as part of this process.

2.2 Operational Staff Management

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of therecord
2.2.1	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980 (Section 2)	Termination of employment + 6 years, unless the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete.	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal/assessment records	Yes		Current year + 3 years.	SECURE DISPOSAL
2.2.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	SECURE DISPOSAL
2.2.5	Training needs analysis	No		Current year + 1 year	SECURE DISPOSAL

2.3 Management of Disciplinary and Grievance Processes

	Basic file description	Data Protection Issues			
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded ²⁰	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 longer, then REVIEW. The retention period will be reviewed once the guidance by the government and ICO about implementing the recommendations made by IICSA has been published.	SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			
	<ul style="list-style-type: none"> Oral warning 			Date of warning + 6 months NOTE: Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice. Relevant to all disciplinary cases. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current.	SECURE DISPOSAL ²²

				<p>However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line and defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence.</p> <p>Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim.</p> <p>Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary</p>	
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				<p>purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.</p>	
	<ul style="list-style-type: none"> • Written warning –level 1 			<p>Date of warning + 6 months</p> <p>If warnings are placed on personal files, then they must be weeded from the file.</p> <p>Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice. Relevant to all</p>	<p>SECURE DISPOSAL²³</p>

				<p>disciplinary cases. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line and defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she</p>	
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				<p>had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim.</p> <p>Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.</p>	
	<ul style="list-style-type: none"> • Written warning –level 2 			<p>Date of warning + 12 months</p> <p>If warnings are placed on personal files, then they</p>	<p>SECURE DISPOSAL²⁴</p>

				<p>must be weeded from the file.</p> <p>Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice. Relevant to all disciplinary cases. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line and defend him- or herself by saying "I would never do something like</p>	
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				<p>that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim. Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future</p>	
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				disciplinary matters, a record of what has occurred will be kept	SECURE DISPOSAL ²⁵
	<ul style="list-style-type: none"> Final warning 			<p>Date of warning + 18 months</p> <p>If warnings are placed on personal files, then they must be weeded from the file.</p> <p>Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice. Relevant to all disciplinary cases. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the</p>	

				<p>employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line and defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim.</p> <p>Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the</p>	
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				<p>effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept</p>	
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²⁰ This review took place when the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention.

²¹ Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice.

²² If warnings are placed on personal files, then they must be weeded from the file.²³ If warnings are placed on personal files, then they must be weeded from the file.²⁴ If warnings are placed on personal files, then they must be weeded from the file.²⁵ If warnings are placed on personal files, then they must be weeded from the file.

2.3 Management of Disciplinary and Grievance Processes					
	Basic file description	Data Protection Issues			
	<ul style="list-style-type: none"> Case not found 			If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL

2.4 Health and Safety					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.4.1	Health and Safety policy statements	No		Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety risk assessments	No		Life of risk assessment + 3 years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred.	SECURE DISPOSAL
2.4.3	Records relating to accident/injury at work	Yes		Date of incident plus 6 years unless the injury is serious - broken limb, more than 3 days in hospital etc then date of incident plus 15 years (Negligence).	SECURE DISPOSAL

2.4 Health and Safety					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.4.4	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format. The incident reporting form may be retained as below. Do not keep completed entries in the book. They must be removed and kept in a locked location.	
	<ul style="list-style-type: none"> Adults 			Date of last entry in the accident book + 3 years but if there is possibility of negligence allegation then date of incident + 15 years or date of settlement + 6 years.	SECURE DISPOSAL
	<ul style="list-style-type: none"> Children 			The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as above. Do not keep completed entries in the book. They must be removed and kept in a locked location.	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No		COSHH sheets should be kept whilst the substance is in use + 6 years COSHH policy documents should be kept until the policy is superseded + 6 years.	SECURE DISPOSAL

2.4.6	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No		Last action + 40 years	SECURE DISPOSAL
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No		2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. To keep the records made and maintained or a copy of these records until the person to whom the record relates has or would have attained the age of 75 years but in any event for at least 30 years from when the record was made.	SECURE DISPOSAL
2.4.8	Fire precautions log books	No		Current year + 6 years	SECURE DISPOSAL
2.4.9	Fire risk assessments	No	Fire Service Order 2005	Life of the risk assessment + 3 years.	SECURE DISPOSAL

2.4 Health and Safety					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.4.10	Incident reports	Yes		Date of incident plus 6 years unless the injury is serious - broken limb, more than 3 days in hospital etc then date of incident plus 15 years (Negligence).	SECURE DISPOSAL

3. Management of the Academy

3.1 Admissions					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
3.1.1	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 + 7 years. 15(2) of the regulation refers to the 7 preceding years.	SECURE DISPOSAL
3.1.2	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	SECURE DISPOSAL

3.1 Admissions					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of therecord
3.1.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December2014	Resolution of case + 1year	SECURE DISPOSAL
3.1.4	Register of admissions	Yes	School attendance: Departmental advice for maintained schools, Academies, independentschools and local authorities October 2014	Every entry in the admission register must be preserved for a periodof 3 years after the date on which the entry was made ²⁶	REVIEW Schools may wish to consider keeping the admission register permanently, as often schools receive enquiries from past pupils to confirm the dates theyattended the school
3.1.5	Admissions – SecondarySchools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL
3.1.6	Proofs of address supplied by parents aspart of the admissionsprocess	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December2014	Current year + 1 year	SECURE DISPOSAL

²⁶ School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014 p6.

3.1 Admissions					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of therecord
3.1.7	Supplementary information form, including additional information such as religion and medical conditions	Yes			
	<ul style="list-style-type: none"> For successful admissions 			This information should be added to the pupil file	SECURE DISPOSAL
	<ul style="list-style-type: none"> For unsuccessful admissions 			Until appeals process completed	SECURE DISPOSAL

3.2 Head Teacher and Senior Management Team					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of therecord
3.2.1	Log books of activity in the school maintained by the HeadTeacher	There may be data protection issues if the logbook refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then REVIEW	These could be of permanent historical value and should be offered to the County Archives Service, if appropriate
3.2.2	Minutes of Senior Management Team meetings and 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

3.2 Head Teacher and Senior Management Team					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of therecord
3.2.3	Reports created by the HeadTeacher or the ManagementTeam	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
3.2.4	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 + 3 years then REVIEW.	SECURE DISPOSAL
3.2.5	Correspondence created by Head Teachers, Deputy HeadTeachers, 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 + 3years then REVIEW	SECURE DISPOSAL
3.2.6	Professional Development Plans	Yes		Life of the plan or plan superseded + 6 years.	SECURE DISPOSAL

3.3 Operational Administration					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of therecord
3.3.1	Management of complaints	Yes		Date complaint resolved + 3 years then review. If the complaint relates to negligence or safeguarding then date the complaint resolved + 15 years.	SECURE DISPOSAL

				If the complaint relates to child sexual abuse then the complaint resolved + 75 years (this retention period will be reviewed once the government and the ICO have issued guidance about the implementation of the IICSA recommendations).	
3.3.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	SECURE DISPOSAL
3.3.3	Records relating to the management of software licences	No		Date licence expires +6 years	SECURE DISPOSAL

3.3 Operational Administration					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of therecord
3.3.4	General file series	No		Current year + 5 yearsthen REVIEW	SECURE DISPOSAL
3.3.5	Records relating to the creation and publication of the school brochure orprospectus	No		Current year + 3 years. Schools should consider archiving one copy for historical reasons.	STANDARD DISPOSAL
3.3.6	Records relating to the creation and distribution of circulars to staff, parents orpupils	No		Current year + 1 year	STANDARD DISPOSAL
3.3.7	Newsletters and other items with a shortoperational use	No		Current year + 1 year	STANDARD DISPOSAL
3.3.8	Visitors' books and signing in sheets	Yes		Academic Year + 1 year [Schools may decide to archive one copy].	SECURE DISPOSAL
3.3.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 yearsthen REVIEW	SECURE DISPOSAL

4. Property Management

This section covers the management of buildings and property.

4.1 Property Management					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
4.1.1	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry	
4.1.2	Plans of property belonging 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	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
4.1.5	Business continuity and disaster recovery plans	No		These are dynamic documents which should be kept up to date.	SECURE DISPOSAL

4.2 Maintenance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of therecord
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years. This may vary on the type of maintenance. Records relating to rewiring, major alterations etc must be retained in the health and safety file whilst the building belongs to the school and must be passed onto any new owners if the building is leased or sold.	SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the school carried out by school employees, including maintenance log books	No		Life of equipment + 6 years. Alterations to wiring and major modifications must be entered in to the health and safety file.	SECURE DISPOSAL

4.3 Fleet Management					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record

4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.2	The process of managing allocation and maintenance of vehicles, e.g., list of who was driving the vehicles and when, maintenance	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.3	Service logs and vehicle logs	N	Limitation Act 1980 (Section 2)	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	SECURE DISPOSAL
4.3.4	GPS tracking data relating to the vehicles	N	Limitation Act 1980 (Section 2)	Current year + 12 months.	SECURE DISPOSAL

5. 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.

5.1 Pupil's Educational Record					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	<ul style="list-style-type: none"> Primary 			Retain whilst the child remains at the primary school	<p>The file should follow the pupil when they leave the primary school. This will include:</p> <ul style="list-style-type: none"> To another primary school To a secondary school To a pupil referral unit <p>If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period.</p> <p>Primary schools do not ordinarily</p>

5.1 Pupil's Educational Record					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
					have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the LA, as it is more likely that the pupil will request the record from the LA
	<ul style="list-style-type: none"> Secondary 		Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	SECURE DISPOSAL
5.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	SECURE DISPOSAL
5.1.3	Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be retained	
5.1.4	Examination results –pupil copies	Yes			
	<ul style="list-style-type: none"> Public 			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"> Internal 			This information should be added to the pupil file	

5.1 Pupil's Educational Record					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	This review took place when the Independent Inquiry on Historical Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention				
5.1.5	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. This retention period will be reviewed when the government and ICO have published guidance about the implementation of the recommendations made by IICSA.	SECURE DISPOSAL – these records MUST be shredded
5.1.6	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"	Date of birth 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 LA Social Services record. This retention period will be reviewed when the government and ICO have published guidance about the implementation of the recommendations made by IICSA.	SECURE DISPOSAL – these records MUST be shredded

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

5.2 Attendance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
5.2.1	Attendance registers	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	SECURE DISPOSAL
5.2.2	Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL

5.3 Special Educational Needs					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
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	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 in order 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 – this should be documented

5.3 Special Educational Needs					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of therecord
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] unless the document is subject to a legal hold then 6 years after legal action ended NOTE: IICSA recommendations awaited.	SECURE DISPOSAL, unless the document is subject to a legal hold
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] unless the document is subject to a legal hold then date legal action ceases + 6 years. This retention period will be reviewed once the government and the Information Commissioner have published guidance about implementing the recommendations made by IICSA.	SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.4	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] unless the document is subject to a legal hold then date legal action ceases + 6 years.	SECURE DISPOSAL, unless the document is subject to a legal hold

				NOTE: This retention period will be reviewed once the government and the Information Commissioner have published guidance about implementing the recommendations made by IICSA.	
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6. Curriculum Management

6.1 Statistics and Management Information					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record

6.1 Statistics and Management Information					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination results (schools copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	SATs records –	Yes			
	<ul style="list-style-type: none"> Results 			<p>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</p> <p>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</p>	SECURE DISPOSAL
	<ul style="list-style-type: none"> Examination papers 			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) reports	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value added and contextual data	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self-evaluation forms	Yes		Current year + 6 years	SECURE DISPOSAL

6.2 Implementation of Curriculum					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
6.2.1	Schemes of work	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
6.2.2	Timetable	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
6.2.3	Class record 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
6.2.4	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	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.6	Pupils' work	No		Where possible, 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

7. Extracurricular Activities

7.1 Educational Visits outside the Classroom					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
7.1.1	Records created by schools in order 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 + 15 years	SECURE DISPOSAL
7.1.2	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Secondary 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 + 15 years	SECURE DISPOSAL
7.1.3	Parental consent	Yes		Conclusion of the trip. NOTE: One-off or blanket consent: The Department for Education (DfE) has prepared a one-off consent form to be signed by the parent on enrolment of their child in a school. This form is intended to cover all types of visits and activities where parental consent is required. The form is available on the DfE website for establishments to adopt and adapt, as appropriate,	Although the consent forms could

	forms for school trips where there has been no major incident ²⁷			at https://www.gov.uk/government/publications/consent-for-school-trips-and-other-off-site-activities . A similar form could be used for other establishments, such as Early Years Foundation Stage (EYFS) providers and youth groups, or at the start of programmes for young people.	be retained for date of birth + 25 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
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²⁷ One-off or blanket consent: The Department for Education (DfE) has prepared a one-off consent form to be signed by the parent on enrolment of their child in a school. This form is intended to cover all types of visits and activities where parental consent is required. The form is available on the DfE website for establishments to adopt and

7.1 Educational Visits outside the Classroom					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years or 15 years after the incident whichever is the longer. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils.	
7.1.5	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years or if there is a major incident then date of incident + 15 years whichever is the longer.	SECURE DISPOSAL

7.2 Walking Bus					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
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]

adapt, as appropriate, at www.gov.uk/government/publications/consent-for-school-trips-and-other-off-site-activities. A similar form could be used for other establishments, such as Early Years Foundation Stage (EYFS) providers and youth groups, or at the start of programmes for young people.

8. Central Government and Local Authority (LA)

This section covers records created in the course of interaction between the school and the LA.

8.1 Local Authority					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
8.1.1	Secondary transfer sheets (Primary)	Yes		Academic year + 2 years.	SECURE DISPOSAL
8.1.2	Attendance returns	Yes		Academic year + 1 years.	SECURE DISPOSAL
8.1.3	School census returns	No		Current year + 5 years	SECURE DISPOSAL

8.2 Central Government					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
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