Ormiston Academies Trust

# Records retention policy

## Policy version control

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|---|---|
| Policy type | Mandatory |
| Author | Alexandra Coughlan, Data Protection and Complaints Manager |
| Approved by | National Leadership Group, October 2024 |
| Release date | November 2024 |
| Review | Policies will be reviewed in line with OAT's internal policy schedule and/or updated when new legislation comes into force |
| Description of changes | ▪ Table of retention periods moved to appendix 1<br>▪ Records retention audit proforma moved to appendix 2<br>▪ Attendance register retention period amended from 3 years to 6 to reflect new statutory guidance |

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# 1. Introduction

1.1. The main aim of this policy is to enable Ormiston Academies Trust to manage hard and electronic records effectively and in compliance with the UK General Data Protection Regulations (UK GDPR). 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.

1.2. Ormiston Academies Trust is 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.

1.3. The table in appendix 1 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.

1.4. For information, the tables below set out the legal and other requirements for certain categories of document.

1.5. Sections 2 -7 of this policy sets out the destruction procedures for documents at the end of their retention period. The Data Protection Officer (DPO) team (dpo@ormistonacademies.co.uk) and academy Data Protection Lead (DPL) shall be responsible for ensuring that this is carried out appropriately, and any questions regarding this policy should be referred to them.

1.6. 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 Data Protection Officer (DPO) via the Data Protection Lead (DPL) 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.

# 2. Deletion and retention of documents

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

2.2. All personal data which is deleted in line with retention periods should be recorded on a log. This can be done as batch entries where appropriate.

2.3. Confidential waste (Secure Disposal) should be made available for collection in the confidential waste bins or sacks or shredded through OAT assessed compliant data disposal organisations.

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

# 3. Other documentation

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

# 4. Automatic deletion

4.1. Certain information will be automatically archived by the computer systems. Should you want to retrieve any information, or prevent this happening in a particular circumstance, please contact the ICT lead in your academy or The Web Services Manager for Head Office.

# 5. Individual responsibility

5.1. Where information for disposal is held by individual members of staff, this should be made available for collection in the confidential waste bins or sacks or shredded through OAT assessed compliant data disposal organisations. Prior to disposal consideration should be given to the following questions:

- Has the information come to the end of its useful life?
- Is there a legal requirement to keep this information or document for a set period?
- 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?)
- Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?
- Is the document of historic or statistical significance?

5.2. If the decision is made to keep the document, this must be referred to the Data Protection Officer via the Data Protection Lead of an individual academy and reasons given.

# 6. Deletion and retention of data stored as email

6.1. Email services have an operational function and are not provided for the storage or filing of documents and as such emails must be reviewed and dealt with promptly.

6.2. Information that is attached to or contained within emails is subject to a retention period as detailed within section 2 of this document.

# 7. Deletion and retention of user accounts, including email and other third-party services

7.1. Network accounts will be locked as soon as the user leaves the employment of the trust or its academies. A decision on the retention of data should be decided within 90 days. The files and emails should be moved to the required appropriate storage during this time.

7.2. A list of the users third party access should already be known for each user or should be able to be ascertained quickly. All third-party access should be removed immediately upon the user leaving the trust.

# 8. Retention audit guidance

8.1. It is the responsibility of the Data Protection Lead (DPL) and local IT to ensure retention audits are conducted at regular intervals. This can be done on a termly basis, half termly or any other interval the academy deems appropriate.

8.2. The Retention Audit findings need to be documented and sent to OAT Data Protection Officer: dpo@ormistonacademies.co.uk.

8.3. It is recommended that all staff at your academy have reviewed the record retention policy and technology acceptable use policy - staff and stakeholders, so that any questions about these policies can be raised and addressed before conducting a retention audit.

8.4. The retention audit should be conducted on a random sample of staff and data types, if possible, avoid staff doing the same job role. For example, if you conducted your audit on 10 members of staff, and they were all teaching staff, this would not include a variety of job roles. Data types can be picked from the sections of the Record Retention Policy E.g. Health and Safety Documents.

8.5. Questionnaire at appendix 2 should be completed by the staff member included in the audit and where possible, the information provided verified by the DPL and/local IT member. For example, if the staff member states they delete emails within the required retention period, then a check of the staff email account should show this is the case.

# Appendix 1 Retention periods

Academies are governed by the Academy Trust, which will usually be a company limited by guarantee[1]. The Academy Trust may also be a charitable trust.

| 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** |
| 1.1.1 | Governance Statement | No | | Life of governance statement + 6 years | 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 | *Companies Act 2006 section 355* | Life of Memorandum of Understanding + 6 years | SECURE DISPOSAL |
| 1.1.5 | Constitution | No | | Life of the Academy | |
| 1.1.6 | Special Resolutions to amend the Constitution | No | | Life of the Academy | |
| 1.1.7 | Written Scheme of Delegation | No | Companies Act 2006 section 355 | Life of Written Scheme of Delegation + 10 years | SECURE DISPOSAL |
| 1.1.8 | Directors – Appointment | No | | Life of appointment + 6 years | SECURE DISPOSAL |

[1] 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.

| 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** |
| 1.1.9 | Directors – Disqualification | No | Company Directors Disqualification Act 1986 | Date of disqualification + 15 years | SECURE DISPOSAL |
| 1.1.10 | Directors – Termination of Office | No | | Date of termination + 6 years | SECURE DISPOSAL |
| 1.1.11 | Annual Report – Trustees Report | No | Companies Act 2006 section 355 | Date of report + 10 years | SECURE DISPOSAL |
| 1.1.12 | Annual Report and Accounts | No | Companies Act 2006 section 355 | Date of report + 10 years | SECURE DISPOSAL |
| 1.1.13 | Annual Return | No | Companies Act 2006 section 355 | Date of report + 10 years | SECURE DISPOSAL |
| 1.1.14 | Appointment of Trustees and Governors and Directors | Yes | | Life of appointment + 6 years | SECURE DISPOSAL |
| 1.1.15 | Statement of Trustees Responsibilities | No | | Life of appointment + 6 years | SECURE DISPOSAL |
| 1.1.16 | Appointment and removal of Members | No | | Life of appointment + 6 years | SECURE DISPOSAL |
| 1.1.17 | Strategic Review | No | | Date of the review + 6 years | SECURE DISPOSAL |
| 1.1.18 | Strategic Plan [also known as School Development Plans] | No | | Life of plan + 6 years | SECURE DISPOSAL |

| 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** |
| 1.1.19 | Accessibility Plan | There may be if the plan refers to specific pupils | Limitation Act 1980 (Section 2) | Life of plan + 6 years | SECURE DISPOSAL |

| 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 |
| | **Committees**[2] | | | | |
| 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** | | | | |
| 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[3] | OFFER TO ARCHIVES |

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

[3] The 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.

| 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** |
| 1.2.7 | Records relating to the management of the Annual General Meeting[4] | 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 |
| | **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[6] |
| 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) | | | Life of Academy | |
| | Inspection Copies[7] | | | Date of meeting + 3 years | SECURE DISPOSAL |

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

[5] The 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.

[6] In 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.

[7] 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

| 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** |
| 1.2.10 | Reports presented to the Governing Body | May be data protection issues, if the report deals with confidential issues relating to staff | | Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy | SECURE DISPOSAL or retain with the signed set of minutes |
| 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 | | PERMANENT | |
| 1.2.13 | Records relating to complaints dealt with by the Governing Body | Yes | | Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes | SECURE DISPOSAL |

redacted copies of the minutes each time a request is made.

| 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 Registers**[8] | | | | |
| 1.2.15 | Register of Directors | | Companies Act 2006 | Life of the Academy + 6 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 | Life of the Academy + 6 years | SECURE DISPOSAL |
| 1.2.20 | Register of secretaries | | Companies Act 2006 | Life of the Academy + 6 years | SECURE DISPOSAL |

[8] 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.

| 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 | | | Life of the Academy + 6 years | SECURE DISPOSAL |
| 1.2.22 | Declaration of Interests Statements [Governors] [this is not a statutory register] | | | Life of the Academy + 6 years | SECURE DISPOSAL |

| 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 |

| Funding and Finance | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 1.3.6 | Borrowing powers | No | | Current financial year + 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 | | Life of the Academy | 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 |
| | **Funding Agreements** | | | | |
| 1.3.12 | Funding Agreement with Secretary of State and supplemental funding agreements9 | No | | Date of last payment of funding + 6 years | SECURE DISPOSAL |

[9] Where there is multi-Academy governance.

| Funding and Finance | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 1.3.13 | Funding Agreement – Termination of the funding agreement[10] | | | Date of last payment of funding + 6 years | 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[11] | No | | Date of last payment of funding + 6 years | SECURE DISPOSAL |
| 1.3.19 | Funding records[12] | No | | Date of last payment of funding + 6 years | SECURE DISPOSAL |
| 1.3.20 | Gift Aid and Tax Relief | No | | Date of last payment of funding + 6 years | SECURE DISPOSAL |

[10] 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.
[11] 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.
[12] 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].

| Funding and Finance | | | | | |
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| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 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 |
| 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** | | | | |

| Funding and Finance | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 1.3.27 | Insurance policies | No | | Date the policy expires + 6 years | SECURE DISPOSAL |
| 1.3.28 | Records relating to the settlement of insurance claims | No | | Date claim settled + 6 years | SECURE DISPOSAL |
| 1.3.29 | Employer's Liability Insurance Certificate | No | | Closure of the school + 40 years | SECURE DISPOSAL |
| | **Endowment Funds and Investments** | | | | |
| 1.3.30 | Investment policies | No | | Life of the investment + 6 years | SECURE DISPOSAL |
| 1.3.31 | Management of Endowment Funds | No | | Life of the fund + 6 years | |
| | **Accounts and Statements** | | | | |
| 1.3.32 | Annual accounts | No | | Current year + 6 years | STANDARD DISPOSAL |
| 1.3.33 | Loans and grants managed by the school | No | | Date of last payment on the loan + 12 years then REVIEW | SECURE DISPOSAL |
| 1.3.34 | Student Grant applications | Yes | | Current year + 3 years | SECURE DISPOSAL |

| Funding and Finance | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 1.3.35 | All records relating to the creation and management of budgets, including the Annual Budget statement and background papers | No | | Life of the budget + 3 years | SECURE DISPOSAL |
| 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 |
| 1.3.38 | Records relating to the identification and collection of debt | No | | Current financial year + 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 | 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 | SECURE DISPOSAL |
| 1.3.41 | Records relating to the monitoring of contracts | No | | Current year + 2 years | SECURE DISPOSAL |

| Funding and Finance | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| | **Asset Management** | | | | |
| 1.3.42 | Inventories of furniture and equipment | No | | Current year + 6 years | 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 | | Current year + 6 years | SECURE DISPOSAL |
| 1.3.45 | Land and building valuations | No | | Date valuation superseded + 6 years | SECURE DISPOSAL |
| 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** | | | | |

| Funding and Finance | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 1.3.51 | School Fund – Cheque books | No | | Current year + 6 years | 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 |
| 1.3.57 | School Fund – Journey books | No | | Current year + 6 years | SECURE DISPOSAL |
| | **School Meals**[13] | | | | |
| 1.3.58 | Free school meals registers | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 1.3.59 | School meals registers | Yes | | Current year + 3 years | SECURE DISPOSAL |
| 1.3.60 | School meals summary sheets | No | | Current year + 3 years | 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 can sell 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.

[13] 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.

| 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 data protection notification | No | | Date policy superseded + 6 years | SECURE DISPOSAL |
| 1.4.2 | Freedom of Information Policy | No | | Date policy superseded + 6 years | SECURE DISPOSAL |
| 1.4.3 | Information Security Breach Policy | No | | Date policy superseded + 6 years | SECURE DISPOSAL |
| 1.4.4 | Special Educational Needs Policy | No | | Date policy superseded + 6 years | SECURE DISPOSAL |
| 1.4.5 | Complaints Policy | No | | Date policy superseded + 6 years | SECURE DISPOSAL |
| 1.4.6 | Risk and Control Framework | No | | Life of framework + 6 years | SECURE DISPOSAL |
| 1.4.7 | Rules and Bylaws | No | | Date rules or bylaws superseded + 6 years | SECURE DISPOSAL |
| 1.4.9 | Home School Agreements[14] | No | | Date agreement revised + 6 years | SECURE DISPOSAL |
| 1.4.10 | Equality Information and Objectives (public sector equality duty) Statement for publication | No | | Date of statement + 6 years | SECURE DISPOSAL |

[14] This should be drawn up in consultation with parents and should apply to all pupils.

| 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** |
| **2.1 Recruitment[15]** | | | | | |
| | **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 | 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 |

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

| 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 |
| 2.1.4 | Pre-employment vetting information – DBS Checks[16] | No | DBS Update Service Employer Guide June 2014 | The organisation should take a copy of the DBS certificate when it is shown to them by the individual and should be added to the Staff Personal File | | SECURE DISPOSAL |
| 2.1.5 | Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure | Yes | | Where possible, these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File | | SECURE DISPOSAL |
| 2.1.6 | Pre-employment vetting information – Evidence proving the right to work in the United Kingdom[17] | 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 |

[16] Academies are bound by the legislation that applies to independent schools NOT maintained schools.

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

| 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 | |
| 2.1.8 | Records relating to the TUPE process | Yes | | Date last member of staff transfers or leaves the organisation + 6 years | SECURE DISPOSAL | |

| Operational Staff Management | | | | | |
|---|---|---|---|---|---|
| | Basic file description | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at end of administrative life of the record |
| 2.2.1 | Staff Personal File, including employment contract and staff training records | Yes | Limitation Act 1980 (Section 2) | Termination of employment + 6 years | SECURE DISPOSAL |
| 2.2.2 | Timesheets | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.2.3 | Annual appraisal/assessment records | Yes | | Current year + 5 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 |

| 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 | Yes | "Keeping children safe in education Statutory guidance for schools and colleges September 2023"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children December 2023" | Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW | SECURE DISPOSAL These records must be shredded |
| 2.3.2 | Disciplinary Proceedings | Yes | | | |
| | • Oral warning | | | Date of warning[18] + 6 months | SECURE DISPOSAL[19] |
| | • Written warning – level 1 | | | Date of warning + 6 months | SECURE DISPOSAL[20] |
| | • Written warning – level 2 | | | Date of warning + 12 months | SECURE DISPOSAL[21] |
| | • Final warning | | | Date of warning + 18 months | SECURE DISPOSAL[22] |

[18] 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.
[19] If warnings are placed on personal files, then they must be weeded from the file.
[20] If warnings are placed on personal files, then they must be weeded from the file.
[21] If warnings are placed on personal files, then they must be weeded from the file.
[22] If warnings are placed on personal files, then they must be weeded from the file.

| Management of Disciplinary and Grievance Processes | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | | | |
| | • Case not found | | | If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case | SECURE DISPOSAL |

| Health and Safety | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at 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 | SECURE DISPOSAL |
| 2.4.3 | Records relating to accident/injury at work | Yes | | Date of incident + 12 years<br>In the case of serious accidents, a further retention period will need to be applied | SECURE DISPOSAL |

| 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<br><br>The incident reporting form may be retained as below | |
| | • Adults | | | Date of incident + 6 years | SECURE DISPOSAL |
| | • Children | | | Date of birth of the child + 25 years | SECURE DISPOSAL |
| 2.4.5 | Control of Substances Hazardous to Health (COSHH) | No | | Current year + 10 years then REVIEW | 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 | | Last action + 50 years | SECURE DISPOSAL |
| 2.4.8 | Fire precautions log books | No | | Current year + 6 years | SECURE DISPOSAL |

| Health and Safety | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 2.4.9 | Fire risk assessments | No | Fire Service Order 2005 | Life of the risk assessment + 6 years | SECURE DISPOSAL |
| 2.4.10 | Incident reports | Yes | | Current year + 20 years | SECURE DISPOSAL |

| 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 + 3 years then REVIEW | SECURE DISPOSAL |

| Admissions | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 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 |
| 3.1.3 | 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 December 2014 | Resolution of case + 1 year | SECURE DISPOSAL |
| 3.1.4 | Register of admissions | Yes | Working together to improve school attendance August 2024 | Every entry in the admission register must be preserved for a period of 6 years after the date on which the entry was made[23] | REVIEW<br>Schools may wish to consider keeping the admission register permanently, as often schools receive enquiries from past pupils to confirm the dates they attended the school |

[23] Working together to improve school attendance: statutory guidance for maintained school, academies, independent schools and local authorities p17

| Admissions | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 3.1.5 | Admissions – Secondary Schools – Casual | Yes | | Current year + 1 year | SECURE DISPOSAL |
| 3.1.6 | Proofs of address supplied by parents as part of the admissions process | Yes | School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014 | Current year + 1 year | SECURE DISPOSAL |
| 3.1.7 | Supplementary information form, including additional information such as religion and medical conditions | Yes | | | |
| | • For successful admissions | | | This information should be added to the pupil file | SECURE DISPOSAL |
| | • For unsuccessful admissions | | | Until appeals process completed | SECURE DISPOSAL |

| Head Teacher and Senior Management Team | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 3.2.1 | Log books of activity in the school maintained by the Head Teacher | There may be data protection issues if the log book 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 |
| 3.2.3 | Reports created by the Head Teacher or the Management Team | 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 + 6 years then REVIEW | SECURE DISPOSAL |
| 3.2.5 | Correspondence 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 correspondence refers to individual pupils or members of staff | | Date of correspondence + 3 years then REVIEW | SECURE DISPOSAL |
| 3.2.6 | Professional Development Plans | Yes | | Life of the plan + 6 years | SECURE DISPOSAL |

| Operational Administration | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 3.3.1 | Management of complaints | Yes | | Date complaint resolved + 3 years | SECURE DISPOSAL |
| 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 |
| 3.3.4 | General file series | No | | Current year + 5 years then REVIEW | SECURE DISPOSAL |
| 3.3.5 | Records relating to the creation and publication of the school brochure or prospectus | No | | Current year + 3 years | STANDARD DISPOSAL |
| 3.3.6 | Records relating to the creation and distribution of circulars to staff, parents or pupils | No | | Current year + 1 year | STANDARD DISPOSAL |
| 3.3.7 | Newsletters and other items with a short operational use | No | | Current year + 1 year | STANDARD DISPOSAL |
| 3.3.8 | Visitors' books and signing in sheets | Yes | | Current year + 6 years then REVIEW | 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 years then REVIEW | SECURE DISPOSAL |

This section covers the management of buildings and property.

| 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 | | Date the plan superseded + 3 years | SECURE DISPOSAL |

| Maintenance | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 4.2.1 | All records relating to the maintenance of the school carried out by contractors | No | | Current year + 6 years | SECURE DISPOSAL |
| 4.2.2 | All records relating to the maintenance of the school carried out by school employees, including maintenance log books | No | | Current year + 6 years | SECURE DISPOSAL |

| 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., lists 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 |

| Fleet Management | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 4.3.4 | GPS tracking data relating to the vehicles | N | Limitation Act 1980 (Section 2) | Date of journey + 6 years | SECURE DISPOSAL |

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

| Pupil's Educational Record | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at 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 | | |
| | • Primary | | | Retain whilst the child remains at the primary school | The file should follow the pupil when they leave the primary school. This will include: |

| Pupil's Educational Record | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| | | | | | • To another primary school<br>• To a secondary school<br>• To a pupil referral unit<br>If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period.<br>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. Primary schools do not ordinarily 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 |

| Pupil's Educational Record | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| | • 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 | | | |
| | • Public | | | This information should be added to the pupil file | All uncollected certificates should be returned to the examination board |
| | • Internal | | | This information should be added to the pupil file | |
| | | | | | |

| Pupil's Educational Record | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 5.1.5 | Child protection information held on pupil file | Yes | "Keeping children safe in education Statutory guidance for schools and colleges September 2023"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children December 2023" | If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file | SECURE DISPOSAL – 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 September 2023"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children December 2023" | Date of birth of the child + 25 years then REVIEW<br>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 | 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.

| 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 |

| 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<br>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 |
| 5.3.2 | 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] | 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] | SECURE DISPOSAL, unless the document is subject to a legal hold |

| Special Educational Needs | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 5.3.4 | 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] | SECURE DISPOSAL, unless the document is subject to a legal hold |

| 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 | | | |

| Statistics and Management Information | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| | • Results | | | 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<br>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 | SECURE DISPOSAL |
| | • 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 |

| 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 |

| Implementation of Curriculum | | | | | |
|---|---|---|---|---|---|
| | **Basic file description** | **Data Protection Issues** | **Statutory Provisions** | **Retention Period [Operational]** | **Action at end of administrative life of the record** |
| 6.2.6 | 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 |

| 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 + 14 years | SECURE DISPOSAL |

| 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** |
| 7.1.2 | 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 + 10 years | SECURE DISPOSAL |
| 7.1.3 | Parental consent forms for school trips where there has been no major incident | Yes | | Conclusion of the trip | Although the consent forms could 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 |

| 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<br>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 | SECURE DISPOSAL |

| 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.<br>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<br>[If these records are retained electronically any back up copies should be destroyed at the same time] |

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

| 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 | | Current year + 2 years | SECURE DISPOSAL |
| 8.1.2 | Attendance returns | Yes | | Current year + 1 year | SECURE DISPOSAL |
| 8.1.3 | School census returns | No | | Current year + 5 years | SECURE DISPOSAL |

| 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 |

# Appendix 2 Record retention audit

Sample Record Retention Audit Questionnaire for Staff:

Staff job title: _____
Date of Audit: _____
Name of Auditor: _____
Auditor's job title: _____

Please ensure you answer all the questions below independently.

1. I can locate policies relating to data retention and know who in my academy can assist with questions?

2. Routine emails not relating to pupils, safeguarding or another legitimate reason should be retained for no longer than?

2a. Do you have emails older than this period? If yes, approximately how many emails?

3. Do you know your academies policy/procedure on deleting confidential data?

3b. Can you please outline what the process is?

4. How often do you review the documents you manage?

5. [Insert a question regarding retention that is specific to the staff members role.] *For example, a teaching staff member could be asked, 'how long we are required to keep Pupil's work?'*

Any questions about this policy should be directed to you Data Protection Lead or OAT Data Protection Officer: dpo@ormistonacademies.co.uk