



'Committed to improving the life chances of all children, wherever they may be'

Record Retention and Disposal Policy

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Contents

The purpose of the retention guidelines.....	3
Benefits of a retention schedule.....	3
Deletion/Disposal of Documents	3
Maintaining and amending the retention schedule	4
Contents of the Pupil Record	4
Using the Retention Schedule.....	5
Schedule:	
1.0 - Pupil Management	6
2.0 - Curriculum Management	9
3.0 - Governance of the Trust	10
4.0 - Funding and Financial Management of the Academy Trust	15
5.0 - Human Resources / Health and Safety.....	20
6.0 - Management of the Academy.....	23
7.0 - Property Management	26
8.0 - Extra-Curricular Activities.....	28
9.0 - Central Government and Local Authority	30

The Purpose of the Retention Guidelines

Under the Freedom of Information Act 2000, schools are required to maintain a retention schedule, listing the record series which the school creates during its business. The retention schedule lays down the length of time over which the record needs to be retained, and the action which should be taken when it is of no further administrative use. The retention schedule lays down the basis for normal processing under the General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000. The 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.

Records are defined as all those documents which facilitate the business carried out by the Trust and which are thereafter retained to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronic format, e.g. paper documents, scanned documents, emails which document activities and decisions, audio video recordings, text messages, notes of telephone and Skype conversations, spreadsheets, MS Word documents and presentations.

The person with overall responsibility for this policy is the Governance and Compliance Officer, supported by GDPR Sentry (DPO) who will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely fashion.

Employees of Orchard Community Trust must ensure that records for which they are responsible are accurate, kept securely, and are maintained and disposed of in accordance with this retention policy. Loss and destruction of records that contain personal data can carry significant penalties from the Information Commissioner's Office (ICO). It is important for all employees, Trustees, Members and Governors of Orchard Community Trust to be aware of this and ensure personal data is not placed at risk and that there are appropriate safeguards in place.

The retention schedule refers to all information, regardless of the media in which it is stored.

Benefits of a Retention Schedule

- Managing records against the retention schedule is deemed to be 'normal processing' under the General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000. Members of staff should be aware that once a Freedom of Information request is received or a legal hold imposed, then records disposal must be stopped.
- Members of staff can be confident that information has been disposed of safely and at the appropriate time.
- Information which is subject to freedom of the General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000 legislation will be available when required.
- Documentation is not maintained or stored unnecessarily.

Deletion of Documents

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

Confidential Waste

- This should be either shredded using the shredding machines available in most offices or made available for collection in the confidential waste bins or sacks located in school offices (if applicable).
- Anything that contains personal information should be treated as confidential.
- When deleting electronically, the retention schedule applies.
- CDs and DVDs must be cut into pieces.

Other documentation

- Other documentation that contains no identifiable information can be deleted or placed in recycling bins where appropriate.

Individual responsibility

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

- A. Has the information come to the end of its useful life?
- B. Is there a legal requirement to keep this information or document for a set period? (Refer to retention schedule for more information)
- C. Would the information be needed in the case of any legal proceedings? Is it potentially relevant to a historical child abuse enquiry? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)
- D. Would the document be useful for the Trust as a precedent, learning document, or for performance management processes?
- E. Is the document of historic or statistical significance?

If the decision is made to keep the document, the reasons why should be documented and communicated to office staff.

Maintaining and amending the retention schedule

Where appropriate, the retention schedule should be reviewed and amended to include any new record series created, as well as to remove any obsolete record series.

This retention schedule contains recommended retention period for the various record series created and maintained by our Trust schools in the course of their business. The schedule refers to all information, regardless of the media in which it is stored. Some of the retention periods are governed by statute; others are guidelines following best practice.

The Trust has a corporate responsibility to maintain these records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher/Governance & Compliance Officer. The person responsible for records management in each of the Trust's schools will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely fashion. Members of staff are expected to manage their current record keeping using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems.

The policy will be reviewed every 3 years, or in the event of a change in the law by the Governance & Compliance Officer.

Contents of the Pupil Record

The table below lists common and potential record types that may form part of the pupil record.

Record Type	Notes
Record of transfer from Early Years setting	If applicable
Admission form	
Data collection/checking form – current	This should be checked regularly by parents to ensure details are accurate
Annual written report to parents	
National curriculum and religious education locally agreed syllabus record sheets	
Any information relating to a major incident involving the child	
Statements/plans, reports, etc. for educational support, e.g. SEN, speech and language	Store in a separate area of the record or keep in a separate linked file
Medical information relevant to the child's ongoing	Store in a separate area of the record or keep in a

education/behaviour	separate linked file
Child protection reports/disclosures and supporting documentation	Store in a separate area of the record or keep in a separate linked file, to limit access to specific staff
Any information relating to exclusions (fixed or permanent)	
Specific correspondence with parents or outside agencies relating to major issues	This may be in e-mail form. Once the matter is closed, save any correspondence that records sequence of events, pertinent issues and outcomes to pupil record
Summary details of complaints made by the parents or the pupil relevant to the child's on-going education/behaviour	This may be in e-mail form, see note above. Most complaints records are retained by the school and not as part of the pupil record
Examination results – pupil copy	Send uncollected certificates back to exam board after all reasonable efforts to contact the pupil have been exhausted [this is a recommendation, not a requirement]

Records not Forming Part of the Pupil Record

The following record types should be stored separately from the main pupil record, as they are usually subject to shorter retention periods (please see the Retention Schedule section); they should not be forwarded to the pupil's next setting:

- Attendance registers and information, including absence (authorised) notes and correspondence
- Parental consent forms for trips/outings
- Accident forms (a copy can be placed on the pupil record if it is a major incident)
- Medicine consent and administering records (this is the school's record)
- Copies of birth certificates, passports, etc.
- Generic correspondence with parents about minor issues
- Pupil work, drawings, etc.
- Previous data collection forms which have been superseded (there is no need to retain these)
- Photography (image) consents (this is the school's record)

Using the Retention Schedule

This Retention Schedule is divided into nine sections:

1. Pupil Management
2. Curriculum Management
3. Governance
4. Funding and Financial Management of the Academy Trust
5. Human Resources / Health and Safety
6. Management of the Academy
7. Property Management
8. Extra-Curricular Activities
9. Central Government and Local Authority

There are subheadings under each section to help guide you to the retention period you are looking for. Each entry has a unique reference number. If you are sending a query to the Governance & Compliance Officer about an individual retention period, please ensure that you have quoted the unique reference number.

The retention schedule is derived from the Information and Records Management Society (IRMS) Information Management Academies Toolkit and amended to reflect Orchard Community Trust's requirements.

1.0 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.

1.1 Pupil's Educational Record					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.1.1	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	<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>
					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
	➤ Secondary		Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	Secure Disposal

1.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	Secure Disposal
1.1.3	Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be retained	
1.1.4	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	
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					
1.1.5	Child protection information held on pupil file Karl: please check with HS/MJ on current advice	Yes	<i>“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” Karl: now updated – should we refer to the latest version on KCSIE??</i>	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 Proposal – these records MUST be shredded
1.1.6	Child protection information held in separate files As above	Yes	<i>“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”</i>	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	Secure Proposal – 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					

1.2 Attendance					
1.2.1	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 Proposal
1.2.2	Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	Secure Proposal
1.3 Special Educational Needs					
1.3.1	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
1.3.2	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 proposal unless the document is subject to a legal hold
1.3.3	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 proposal unless the document is subject to a legal hold
1.3.4	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 proposal unless the document is subject to a legal hold

2.0 Curriculum Management

2.1 Statistics and Management Information					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.1.1	Curriculum returns	No		Current year + 3 years	Secure Proposal
2.1.2	Examination results (schools' copy)	Yes		Current year + 6 years	Secure Proposal
	SATs records –	Yes			
	➤ Results			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. 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 Proposal
	➤ Examination papers			The examination papers should be kept until any appeals/validation process is complete	Secure Proposal
2.1.3	Published Admission Number (PAN) reports	Yes		Current year + 6 years	Secure Proposal
2.1.4	Value added and contextual data	Yes		Current year + 6 years	Secure Proposal
2.1.5	Self-evaluation forms	Yes		Current year + 6 years	Secure Proposal
2.2 Implementation of Curriculum					
2.2.1	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 proposal
2.2.2	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 proposal

2.2.3	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 proposal
2.2.4	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 proposal
2.2.5	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 proposal
2.2.6	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 Proposal

3.0 Governance 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.

3.1 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
3.1.1	Governance Statement	No		Life of governance statement + 6 years	Secure Proposal
3.1.2	Articles of Association	No		Life of the Academy	
3.1.3	Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	Secure Proposal
3.1.4	Memorandum of Understanding of Shared Governance among Schools	No	<i>Companies Act 2006 section 355</i>	Life of Memorandum of Understanding + 6 years	Secure Proposal
3.1.5	Constitution	No		Life of the Academy	
3.1.6	Special Resolutions to amend the Constitution	No		Life of the Academy	

3.1.7	Written Scheme of Delegation	No	<i>Companies Act 2006 section 355</i>	Life of Written Scheme of Delegation + 10 years	Secure Proposal
3.1.8	Trustees – Appointment	No		Life of appointment + 6 years	Secure Proposal
3.1.9	Trustees – Disqualification	No	<i>Company Directors Disqualification Act 1986</i>	Date of disqualification + 15 years	Secure Proposal
3.1.10	Trustees – Termination of Office	No		Date of termination + 6 years	Secure Proposal
3.1.11	Annual Report – Trustees Report	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	Secure Proposal
3.1.12	Annual Report and Accounts	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	Secure Proposal
3.1.13	Annual Return	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	Secure Proposal
3.1.14	Appointment of Trustees and Governors	Yes		Life of appointment + 6 years	Secure Proposal
3.1.15	Statement of Trustees Responsibilities	No		Life of appointment + 6 years	Secure Proposal
3.1.16	Appointment and removal of Members	No		Life of appointment + 6 years	Secure Proposal
3.1.17	Strategic Review	No		Date of the review + 6 years	Secure Proposal
3.1.18	Strategic Plan [also known as School Development Plans]	No		Life of plan + 6 years	Secure Proposal
3.1.19	Accessibility Plan	There may be if the plan refers to specific pupils	Limitation Act 1980 (Section 2)	Life of plan + 6 years	Secure Proposal

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 the **company**. In the case of an Academy, the guarantors will guarantee the sum of £10 each.

3.2 Board of Trustees (Directors) Members Meetings and Local Governing Boards (LGBs)					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
Board of Trustees/Directors					
3.2.1	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
3.2.2	Board Decisions	Could be if the decisions refer to living individuals		Date of the meeting + a minimum of 10 years	Offer to Archives
3.2.3	Board Meeting: Annual Schedule of Business	No		Current year	Secure Proposal
3.2.4	Board Meeting: Procedures for conduct of meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	Secure Proposal
Committees⁴					
3.2.5	Minutes relating to any committees set up by the Board of Trustees	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	Offer to Archives
General Members' Meeting					
3.2 Board of Trustees (Directors) Members Meetings and Local Governing Boards (LGBs)					
3.2.6	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
3.2.7	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					
3.2.8	Agendas for Local Governing Boards	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 Proposal ⁸

3.2 Board of Trustees (Directors), Members Meetings and Local Governing Boards (LGBs)					
3.2.9	Minutes of, and papers considered at, meetings of the LGB 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 ⁹			Date of meeting + 3 years	Secure Proposal
3.2.10	Reports presented to the Governing Board	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 Proposal or retain with the signed set of minutes
3.2.11	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 Proposal
3.2.12	Trusts and Endowments managed by the LGB	No		Permanent	
3.2.13	Records relating to complaints dealt with by the LGB	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	Secure Proposal
3.2 Board of Trustees (Directors), Members Meetings and Local Governing Boards (LGBs)					
3.2.14	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 Proposal
Statutory Registers¹⁰					
3.2.15	Register of Trustees (Directors)		Companies Act 2006	Life of the Academy + 6 years	Secure Proposal

3.2.16	Register of Trustees (Directors') interests [this is not a statutory register]			Life of the Academy + 6 years	Secure Proposal
3.2.17	Register of Trustees (Directors') residential addresses		Companies Act 2006	Life of the Academy + 6 years	Secure Proposal
3.2.18	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	Secure Proposal
3.2.19	Register of members		Companies Act 2006	Life of the Academy + 6 years	Secure Proposal
3.2.20	Register of secretaries		Companies Act 2006	Life of the Academy + 6 years	Secure Proposal
3.2.21	Register of Trustees' (Directors') interests			Life of the Academy + 6 years	Secure Proposal
3.2.22	Declaration of Interests Statements [Governors] [this is not a statutory register]			Life of the Academy + 6 years	Secure Proposal

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

5 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.

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

7 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.

8 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.

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.

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 Trustees (Directors'). Records should be kept up to date to reflect any changes that take place.

4.0 - Funding and Financial Management of the Academy Trust

4.1 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					
4.1.1	Statement of financial activities for the year	No		Current financial year + 6 years	Secure Proposal
4.1.2	Financial planning	No		Current financial year + 6 years	Secure Proposal
4.1.3	Value for money statement	No		Current financial year + 6 years	Secure Proposal
4.1.4	Records relating to the management of VAT	No		Current financial year + 6 years	Secure Proposal
4.1.5	Whole of government accounts returns	No		Current financial year + 6 years	Secure Proposal
4.1.6	Borrowing powers	No		Current financial year + 6 years	Secure Proposal
4.1.7	Budget plan	No		Current financial year + 6 years	Secure Proposal
4.1.8	Charging and remissions policy	No		Date policy superseded + 3 years	Secure Proposal
Audit Arrangements					
4.1.9	Audit Committee and appointment of responsible officers	No		Life of the Academy	Secure Proposal
4.1.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	Secure Proposal
4.1.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	Secure Proposal
Funding Agreements					
4.1.12	Funding Agreement with Secretary of State and supplemental funding agreements ¹¹	No		Date of last payment of funding + 6 years	Secure Proposal

4.1.13	Funding Agreement Termination of the funding agreement ¹²			Date of last payment of funding + 6 years	Secure Proposal
4.1.14	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	Secure Proposal
4.1.15	Funding Records - Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	Secure Proposal
4.1.16	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	Secure Proposal
4.1.17	Per pupil funding records	No		Date of last payment of funding + 6 years	Secure Proposal
4.1.18	Exclusions agreement 13	No		Date of last payment of funding + 6 years	Secure Proposal
4.1.19	Funding records ¹⁴	No		Date of last payment of funding + 6 years	Secure Proposal
4.1.20	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	Secure Proposal
4.1.21	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 Proposal
Payroll and Pensions					
4.1.22	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	Secure Proposal
4.1.23	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 Proposal
4.1.24	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	Secure Proposal
4.1.25	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	Secure Proposal
4.1.26	Payroll records	Yes		Date payroll run + 6 years	Secure Proposal
Risk Management and Insurance					
4.1.27	Insurance policies	No		Date the policy expires + 6 years	Secure Proposal

4.1.28	Records relating to the settlement of insurance claims	No		Date claim settled + 6 years	Secure Proposal
4.1.29	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	Secure Proposal
Endowment Funds and Investments					
4.1.30	Investment policies	No		Life of the investment + 6 years	Secure Proposal
4.1.31	Management of Endowment Funds	No		Life of the fund + 6 years	
Accounts and Statements					
4.1.32	Annual accounts	No		Current year + 6 years	Standard Disposal
4.1.33	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	Secure Proposal
4.1.34	Student Grant applications	Yes		Current year + 3 years	Secure Proposal
4.1.35	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 Proposal
4.1.36	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	Secure Proposal
4.1.37	Records relating to the collection and banking of monies	No		Current financial year+ 6 years	Secure Proposal
4.1.38	Records relating to the identification and collection of debt	No		Current financial year+ 6 years	Secure Proposal
Contract Management					
4.1.39	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	Secure Proposal
4.1.40	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	Secure Proposal
4.1.41	Records relating to the monitoring of contracts	No		Current year + 2 years	Secure Proposal

Asset Management					
4.1.42	Inventories of furniture and equipment	No		Current year + 6 years	Secure Proposal
4.1.43	Burglary, theft and vandalism report forms	No		Current year + 6 years	Secure Proposal
4.1.44	Records relating to the leasing of shared facilities, such as sports center's	No		Current year + 6 years	Secure Proposal
4.1.45	Land and building valuations	No		Date valuation superseded + 6 years	Secure Proposal
4.1.46	Disposal of assets	No		Date asset disposed of + 6 years	Secure Proposal
4.1.47	Community School leases for land	No		Date lease expires + 6 years	Secure Proposal
4.1.48	Commercial transfer arrangements	No		Date of transfer + 6 years	Secure Proposal
4.1.49	Transfer of land to the Academy Trust	No		Life of land ownership then transfer to new owner	Secure Proposal
4.1.50	Transfers of freehold land	No		Life of land ownership then transfer to new owner	Secure Proposal
School Fund					
4.1.51	School Fund – Cheque books	No		Current year + 6 years	Secure Proposal
4.1.52	School Fund – Paying in books	No		Current year + 6 years	Secure Proposal
4.1.53	School Fund – Ledger	No		Current year + 6 years	Secure Proposal
4.1.54	School Fund – Invoices	No		Current year + 6 years	Secure Proposal
4.1.55	School Fund – Receipts	No		Current year + 6 years	Secure Proposal
4.1.56	School Fund – Bank statements	No		Current year + 6 years	Secure Proposal
4.1.57	School Fund – Journey books	No		Current year + 6 years	Secure Proposal
School Meals¹⁵					
4.1.58	Free school meals registers	Yes		Current year + 6 years	Secure Proposal
4.1.59	School meals registers	Yes		Current year + 3 years	Secure Proposal

4.1.60	School meals summary sheets	No		Current year + 3 years	Secure Proposal
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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.

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].

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.

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.

4.2 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
4.2.1	Data Protection Policy, including data protection notification	No		Date policy superseded+ 6 years	Secure Proposal
4.2.2	Freedom of Information Policy	No		Date policy superseded+ 6 years	Secure Proposal
4.2.3	Information Security Breach Policy	No		Date policy superseded+ 6 years	Secure Proposal
4.2.4	Special Educational Needs Policy	No		Date policy superseded+ 6 years	Secure Proposal
4.2.5	Complaints Policy	No		Date policy superseded+ 6 years	Secure Proposal
4.2.6	Risk and Control Framework	No		Life of framework + 6 years	Secure Proposal
4.2.7	Rules and Bylaws	No		Date rules or bylaws superseded + 6 years	Secure Proposal
4.2.8	Home School Agreements 16	No		Date agreement revised + 6 years	Secure Proposal

4.2.9	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	Secure Proposal
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16 This should be drawn up in consultation with parents and should apply to all pupils.

5.0 Human Resources

5.1 Recruitment ¹⁷					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
5.1.1	All records leading up to the appointment of a new Headteacher	Yes		Date of appointment + 6 years	Secure Proposal
5.1.2	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 Proposal
5.1.3	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 Proposal
5.1.4	Pre-employment vetting information – DBS Checks ¹⁸	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 Proposal
5.1.5	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 Proposal
5.1.6	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 Proposal

5.1.7	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 Proposal
5.1.8	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	Secure Proposal

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.

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

5.2 Operational Staff Management

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
5.2.1	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980 (Section 2)	Termination of employment + 6 years	Secure Proposal
5.2.2	Timesheets	Yes		Current year + 6 years	Secure Proposal
5.2.3	Annual appraisal/assessment records	Yes		Current year + 5 years	Secure Proposal
5.2.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	Secure Proposal
5.2.5	Training needs analysis	No		Current year + 1 year	Secure Proposal

5.3 Management of Disciplinary and Grievance Processes

5.3.1	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	Secure Proposal These records must be shredded
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			<i>We need to reference the most recent version please</i>		
5.3.2	Disciplinary Proceedings	Yes			
	Oral warning			Date of warning ²¹ + 6 months	Secure Proposal ²²
	Written warning – level 1			Date of warning + 6 months	Secure Proposal ²³
	Written warning – level 2			Date of warning + 12 months	Secure Proposal ²⁴
	Final warning			Date of warning + 18 months	Secure Proposal ²⁵
	Case not found			If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	Secure Proposal

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.

5.4 Health and Safety					
5.4.1	Health and Safety policy statements	No		Life of policy + 3 years	Secure Proposal
5.4.2	Health and Safety risk assessments	No		Life of risk assessment + 3 years	Secure Proposal
5.4.3	Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	Secure Proposal
5.4.4	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	
	➤ Adults			Date of incident + 6 years	Secure Proposal
	➤ Children			Date of birth of the child + 25 years	Secure Proposal

5.4.5	Control of Substances Hazardous to Health (COSHH)	No		Current year + 10 years then REVIEW	Secure Proposal
5.4.6	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No		Last action + 40 years	Secure Proposal
5.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No		Last action + 50 years	Secure Proposal
5.4.8	Fire precautions logbooks	No		Current year + 6 years	Secure Proposal
5.4.9	Fire risk assessments	No	Fire Service Order 2005	Life of the risk assessment + 6 years	Secure Proposal
5.4.10	Incident reports	Yes		Current year + 20 years	Secure Proposal

6.0 Management of the Academy

6.1 Admissions					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
6.1.1	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 Proposal
6.1.2	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 Proposal
6.1.3	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 Proposal

6.1.4	Register of admissions	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the admission register must be preserved for a period of 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 they attended the school
6.1.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	Secure Proposal
6.1.6	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 Proposal
6.1.7	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 Proposal
	➤ For unsuccessful admissions			Until appeals process completed	Secure Proposal
²⁶ School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014 p6.					
6.2 Headteacher and Senior Management Team					
6.2.1	Logbooks of activity in the school maintained by the Headteacher Do our schools still keep logbooks? Not sure that they do!	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
6.2.2	These could be of permanent historical value and should be	There may be data protection issues if the		Date of the meeting + 3 years then Review	Secure Proposal

	offered to the County Archives Service, if appropriate	minutes refers to individual pupils or members of staff			
6.2.3	Reports created by the Headteacher 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 Proposal
6.2.4	Records created by Headteachers, Deputy Headteachers, 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 Proposal
6.2.5	Correspondence created by Headteachers, 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 + 3 years then Review	Secure Proposal
6.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	Secure Proposal
6.3 Operational Administration					
6.3.1	Management of complaints	Yes		Date complaint resolved + 3 years	Secure Proposal
6.3.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	Secure Proposal
6.3.3	Records relating to the management of	No		Date licence expires + 6 years	Secure Proposal

	software licences				
6.3.4	General file series	No		Current year + 5 years then Review	Secure Proposal
6.3.5	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	Secure Proposal
6.3.6	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	Secure Proposal
6.3.7	Newsletters and other items with a short operational use	No		Current year + 1 year	Secure Proposal
6.3.8	Visitors' books and signing in sheets	Yes		Current year + 6 years then review	Secure Proposal
6.3.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then Review	Secure Proposal

7.0 Property Management

This section covers the management of buildings and property.

7.1 Property Management					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
7.1.1	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry	

7.1.2	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	
7.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	Secure Proposal
7.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	Secure Proposal
7.1.5	Business continuity and disaster recovery plans	No		Date the plan superseded + 3 years	Secure Proposal
7.1.2 Maintenance					
7.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	Secure Proposal
7.2.2	All records relating to the maintenance of the school carried out by school employees, including maintenance logbooks	No		Current year + 6 years	Secure Proposal
7.1.3 Fleet Management					
7.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	No	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	Secure Proposal

7.3.2	The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, maintenance	No	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	Secure Proposal
7.3.3	Service logs and vehicle logs	No	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 Proposal
7.3.4	GPS tracking data relating to the vehicles	No	Limitation Act 1980 (Section 2)	Date of journey + 6 years	Secure Proposal

8.0 Extracurricular Activities

8.1 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
8.1.1	Records created by schools 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 Proposal
8.1.2	Records created by schools 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 Proposal

8.1.3	Parental consent forms for school trips where there has been no major incident ²⁷	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
8.1.4	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. 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	
8.1.5	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	Secure Proposal

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 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.

8.2 Walking Bus					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
8.2.1	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 Proposal [If these records are retained electronically any backup copies should be destroyed at the same time]

9.0 Central Government and Local Authority (LA)

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

9.1 Local Authority					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
9.1.1	Secondary transfer sheets (Primary)	Yes		Current year + 2 years	Secure Proposal
9.1.2	Attendance returns	Yes		Current year + 1 year	Secure Proposal
9.1.3	School census returns	No		Current year + 5 years	Secure Proposal
9.2 Central Government					
9.2.1	OFSTED reports and papers	No		Life of the report then REVIEW	Secure Proposal
9.2.2	Returns made to central government	No		Current year + 6 years	Secure Proposal
9.2.3	Circulars and other information sent from central government	No		Operational use	Secure Proposal