

THE HEATH ACADEMY TRUST

Data Record Management and Retention Policy

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The Heath Academy



Growing Excellent Learners

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2023-01	Nov 2023	3 year review updated Retention Guidelines in line with IRMS Information Management Toolkit for Academies IRMS Academies Toolkit - Information and Records Management Society
2023-02	Sep 2025	Amendment to 2.1.5 and 2.1.6 following update to DBS checking guidelines

1. Introduction
 - 1.1 The Heath Academy Trust recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.
 - 1.2 Scope Of The Policy
 - 1.2.1 This policy applies to all records created, received or maintained by staff of the schools and Trust in the course of carrying out its functions.
 - 1.2.2 Records are defined as all those documents that facilitate the business carried out by the schools and Trust and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.
2. Responsibilities
 - 2.1 The Trust and schools have a corporate responsibility to maintain their records and record keeping systems in accordance with the regulatory environment. Overall responsibility for this policy is the Trust Board.
 - 2.2 The person responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way.
 - 2.3 The Data Protection Officers (DPOs)/Data Protection Controllers (DPCs) will monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
 - 2.4 Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the school's retention guidelines.
3. Information Security & Business Continuity
 - 3.1 In order to protect the data and records the school is responsible for, the following security measures will be implemented.
 - 3.2 The Storage & Security Of Digital Data
 - 3.2.1 Back Up System

The Trust and schools will undertake regular back-ups of all information held electronically to enable restoration of the data in the event of an environmental or data corruption incident.
 - 3.2.2 The Trust and schools tests that data can be restored from a back-up on a regular basis.
 - 3.3 Controlling The Storage Of Digital Data
 - 3.3.1 Personal information is not to be stored on the hard drive of any laptop or PC unless the device is running encryption software.
 - 3.3.2 The Trust Bring Your Own Device Policy outlines how data can be accessed and stored on personal devices.
 - 3.4 Password Control

- 3.4.1 The Trust/school will ensure that data is subject to a robust password protection regime. Password sharing is not encouraged. Staff are required to lock their PCs and any other devices when they are away from their desks to prevent unauthorised use.
- 3.4.2 Location Of Server Equipment
The school will ensure that the server environment is managed to prevent access by unauthorised people.
- 3.5 The Storage & Security of Hard Copy Data
- 3.5.1 Storage Of Physical Records
The Trust/school recommends that all physical records are stored in filing cabinets, drawers or cupboards. Sensitive physical records should be kept in a lockable storage area. This is to prevent unauthorised access but also to protect against the risk of fire and flooding.
- 3.5.2 Unauthorised Access, Theft or Loss
Staff are encouraged not to take personal data on staff or students out of the school unless there is no alternative. Records held within the school should be in lockable cabinets.
- 3.5.3 Clear Desk Policy
In order to avoid unauthorised access to physical records which contain sensitive or personal information, the school operates a clear desk policy. This involves the removal of the physical records to a cupboard or drawer (lockable where appropriate). It does not mean that the desk has to be cleared of all contents.
4. Disclosure/Confidentiality
- 4.1 Staff are made aware of the importance of ensuring that personal information is only disclosed to people who are entitled to receive it and that consideration has been given to the General Data Protection Regulations.
- 4.2 If the Trust/school receives a request for information from a third party, then the process outlined in the 3rd Party Request For Information Process should be followed.
5. Safe Disposal Of Records
- 5.1 The General Data Protection Regulations give individuals the Right to Erasure which means that records should not be kept for any longer than is necessary in relation to the purpose for which it was originally collected/processed (see section 7 on Retention Guidelines).
- 5.2 All records containing personal information or sensitive policy information should be made either unreadable or unreconstructable.
- paper records should be shredded using a cross-cutting shredder
 - CDs/DVDs/floppy discs should be cut into pieces
 - audio/video tapes and fax rolls should be dismantled and shredded
 - hard discs should be dismantled and sanded
 - if an external provider is used all records must be shredded on site in the presence of an employee.
- The disposal company must provide a Certificate of Destruction.
6. Security Breach
- 6.1 In the event of an incident involving the loss of information or records held by the school, the Data Breach Procedure should be followed.
7. Retention Guidelines

- 7.1 This retention schedule contains recommended retention periods for the different records created and maintained by the Trust/schools in the course of their business. The schedule refers to all information regardless of the media in which it is stored.
- 7.2 Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the Data Protection Act (DPA).
- 7.3 Managing record series using these retention guidelines will be deemed to be 'normal processing' under the legislation mentioned above. If records are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented. The schedule should be reviewed on an annual basis.

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

1.1 Governance of the Academy Trust					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
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 Trust	
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 Trust	
1.1.6	Special Resolutions to amend the Constitution	No		Life of the Academy Trust	
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
1.1.9	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 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

1.2 Board of Directors, Members Meetings and Governing Body					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
	Board of Directors				
1.2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	At least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.2	Board Decisions	Could be if the minutes refer to living individuals		At least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.3	Board Meeting: Annual Schedule of Business	No		Current Year	SECURE DISPOSAL
1.2.4	Board Meeting: Procedure of conduct for meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	SECURE DISPOSAL
	Committees				
1.2.5	Minutes relating to any committee set up by the Board of Directors	Could be if the minutes refer to living individuals		At least 10 years from the date of the meeting	SECURE DISPOSAL
	General Members Meeting				
1.2.6	Records relating to the management of General Members meeting	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	At least 10 years from the date of the meeting	SECURE DISPOSAL
1.2.7	Records relating to the management of the Annual General Meeting	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	At least 10 years from the date of the meeting	SECURE DISPOSAL
	Statutory Registers				
1.2.8	Register of Directors		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL

1.2.9	Register of Directors interests (this is not a statutory register)			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.10	Register of Directors residential addresses		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.11	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.12	Register of Members		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.13	Register of secretaries		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.14	Register of Trustees interests			Life of the Academy + 6 years	SECURE DISPOSAL

1.3 Funding and Finance

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
	Strategic Finance				
1.3.1	Statement of financial activities for the year	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.2	Financial planning	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.3	Value for money statement	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.4	Records relating to the management of VAT	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.5	Whole of government accounts returns	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.6	Borrowing powers	No		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 the report relates to + 6 years	SECURE DISPOSAL
1.3.11	Independent Auditor's report on financial statements	No		Financial year the report relates to + 6 years	SECURE DISPOSAL
	Funding Agreements				
1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements	No		Date of the last payment of funding + 6 years	
1.3.13	Funding Agreement – Termination of the funding agreement			Date of last payment of funding + 6 years	
1.3.14	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	
1.3.15	Funding Records – Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	
1.3.16	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	
1.3.17	Per pupil funding records	No		Date of last payment of funding + 6 years	
1.3.18	Exclusions agreement	No		Date of last payment of funding + 6 years	
1.3.19	Funding records	No		Date of last payment of funding + 6 years	
1.3.20	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	
1.3.21	Records relating to loans	No		Date of last payment of loan + 6 yers if the loan is under £10,000 or + 12 years if the loan is over £10,000	
	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				
1.3.27	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL
1.3.28	Insurance Policies	No		Date the policy expires + 6 years	SECURE DISPOSAL
1.3.29	Records relating to the settlement of insurance claims	No		Date claim settled + 6 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	SECURE DISPOSAL
	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

1.3.35	All records relating to the creation and management of budgets including the Annual Budget statements 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 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 contract + 6 years	SECURE DISPOSAL
1.3.41	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL
	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				
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				
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

1.4 Policies, Frameworks and Overarching Requirements

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
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
1.4.8	Home School Agreements	No		Date agreements revised + 6 years	SECURE DISPOSAL
1.4.9	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	SECURE DISPOSAL

Section 2. Human Resources

2.1 Recruitment					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
2.1.1	All records leading up to the appointment of a new headteacher	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 the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS checks	No	DBS Update Service Employer Guide	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 Personnel File	SECURE DISPOSAL
2.1.5	Proofs of identity collected as part of the process of checking portable enhanced DBS disclosure	Yes		These should be checked and a note kept of what has been checked on form E1d (Identity Check) which should be added to the Staff Personnel File	SECURE DISPOSAL
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	An employer's guide to right to work checks	These documents should be added to the Staff Personal File [see below].	SECURE DISPOSAL
2.1.7	Records relating to the employment of overseas teachers	Yes		Where possible these documents should be added to the Staff Personnel File, but if they	SECURE DISPOSAL

				are kept separately then the Home Office requires that the documents are kept for termination of employment plus not less than two years	
2.1.8	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6years	SECURE DISPOSAL

2.2 Operational Staff Management

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
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 + 3 years	SECURE DISPOSAL
2.2.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	SECURE DISPOSAL
2.2.5	Training needs analysis	No		Current year + 1 year	SECURE DISPOSAL

2.3 Management of Disciplinary & Grievance Process

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	“Keeping children safe in education” “Working together to safeguard children”	Until the person’s normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be	SECURE DISPOSAL These records must be shredded

				removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned	
2.3.3	Disciplinary Proceedings	Yes			
	Oral warning			Date of warning + 6 months	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file]
	Written warning – level 1			Date of warning + 6 months	
	Written warning – level 2			Date of warning + 12 months	
	Final warning			Date of warning + 18 months	
	Case not found			If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL

2.4 Health & Safety

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
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. In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
2.4.4	Accident Reporting		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 the incident + 6 years	SECURE DISPOSAL
	Children			DOB of the child + 25 years	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18(2)	Current year + 10 years then review	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire precautions log books			Current year + 6 years	SECURE DISPOSAL
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

Section 3. Management Of The Schools

3.1 Local School Committee

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
3.1.1	Agendas for LSC	There 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
3.1.2	Minutes of LSC Meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff			
	Principal Set (signed)			Life of the school	If the school is unable to store these then they should be offered to the County Archives Service.
	Inspection Copies			Date of meeting + 3 years	If the minutes contain any sensitive, personal information they must be shredded
3.1.3	Reports presented to the LSC	There may be data protection issues if the report is dealing 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 permanently.	SECURE DISPOSAL or retain with the signed set of minutes
3.1.4	Meeting papers relating to 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

3.2 Senior Leadership Team					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
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 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 the 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 + 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 report refers 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 report refers to individual pupils or members of staff		Date of correspondence + 3years ten review	SECURE DISPOSAL
3.2.6	Professional Development Plans	Yes		Life of then plan + 6 years	SECURE DISPOSAL
3.2.7	School Development Plans	No		Life of the plan + 3 years	SECURE DISPOSAL

3.3 Admissions					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
3.3.1	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, school adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then review	SECURE DISPOSAL
3.3.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL
3.3.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
3.3.4	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 three years after the date on which the entry was made	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.
3.3.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL

3.3.6	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, school adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL
3.3.7	Supplementary Information form including additional information such as religion, medical conditions etc.	Yes			
	For successful admissions			The information should be added to the pupil file	SECURE DISPOSAL
	For unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL

3.4 Operational Administration

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
3.4.1	Management of complaints	Yes		Date complaint resolved +3 years	SECURE DISPOSAL
3.4.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	SECURE DISPOSAL
3.4.3	Records relating to the management of software licences	No		Date licence expires + 6 years	SECURE DISPOSAL
3.4.4	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
3.4.5	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	SECURE DISPOSAL
3.4.6	Records relating to the creation and distribution of	No		Current year + 1 year	SECURE DISPOSAL

	circulars to staff, parents or pupils				
3.4.7	Newsletters and other items with a short operational use	No		Current year + 1 year	SECURE DISPOSAL
3.4.8	Visitors' Books and Signing in Sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
3.4.9	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

Section 4. Property Management

4.2 Property Management

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
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4.2.1	Title deeds of properties belonging to the school	No		PERMANENT These should follow the property unless the property has been registered with the Land Registry	
4.2.2	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	
4.2.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.2.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
4.2.5	Business continuity and disaster recovery plans	No		Date the plans superseded + 3 years	SECURE DISPOSAL

4.3 Maintenance

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
4.3.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
4.3.2	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

4.4 Fleet Management

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
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4.4.1	The process of acquisition and disposal of vehicles through lease or purchase eg. Contracts/leases, quotes, approvals	No	Limitation Act 1980 (section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.4.2	The process of managing allocation and maintenance of vehicles eg. Lists of who was driving the vehicles and when, maintenance	No	Limitation Act 1980 (section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.4.3	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 DISPOSAL
4.4.4	GPS tracking data relating to the vehicles	No	Limitation Act 1980 (section 2)	Date of journey + 6 years	SECURE DISPOSAL

Section 5. Pupil Management

5.1 Pupil's Educational Record					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
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 primary school	The files should follow the pupil when he/she leaves the primary school. This will include: To another primary school To a secondary school To a pupil referral unit If the pupil dies whilst at primary school the file should be returned to the Local Authority 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 Local Authority 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 Local Authority as it is more likely that the pupil will

					request the record from the Local Authority
	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 + 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	
5.1.5	Child Protection information held on pupil file	Yes	“Keeping children safe in education” “Working together to safeguard children”	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” “Working together to safeguard children”	DOB of the child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record	SECURE DISPOSAL – these records MUST be shredded
5.2 Attendance					

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
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 three years after the date on which the entry was made.	SECURE DISPOSAL
5.2.2	Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL

5.3 Special Educational Needs

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of birth of 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 to defend themselves in a “failure to provide a sufficient education” case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented
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 by 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
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

Section 6. Curriculum Management

6.1 Statistics & Management Information					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
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			
	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. The school may wish to keep a composite record of all the whole year SAT's 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

6.2 Implementation of Curriculum					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
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
6.2.2	Timetable	No		Current Year + 1 year	
6.2.3	Class Record Books	No		Current Year + 1 year	

6.2.4	Mark Books	No		Current Year + 1 year	allocate a further retention period or SECURE DISPOSAL
6.2.5	Record of Homework set	No		Current Year + 1 year	
6.2.6	Pupil's Work	No		Where possible pupil's 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

Section 7. Extra Curricular Activities

7.1 Educational Visits Outside The Classroom					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
7.1.1	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 + end of school year	SECURE DISPOSAL
7.1.2	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 + end of school year	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 DOB + 22 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
7.1.4	Parental permission slips for schools trips – where	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil involved in the incident + 25 years. The permission slips for all	

	there has been a major incident			the pupils on the trip need to be retained to show 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

7.2 Walking Bus

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
7.2.1	Walking Bus Registers	Yes		Date of register + end of school year, unless an investigation is on-going. This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL [If these records are retained electronically any backup copies should be destroyed at the same time]

7.3 Family Liaison Officers & Home School Liaison Assistants

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
7.3.1	Day Books	Yes		Current year + 2 years then review	
7.3.2	Reports for outside agencies – where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	
7.3.3	Referral Forms	Yes		While the referral is current	

7.3.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	
7.3.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	
7.3.6	Group Registers	Yes		Current year + 2 years	

Section 8. Central Government & Local Authority

8.1 Local Authority					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
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
8.1.4	Circulars and other information sent from the Local Authority	No		Operational use	SECURE DISPOSAL

8.2 Central Government					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action At The End Of The Records Life
8.2.1	OFSTED reports and papers	No		Life of the report the 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		Operation use	SECURE DISPOSAL

