

# RECORDS MANAGEMENT POLICY

Learning Academies Trust

Version: Version 1  
Approved by: Jonathan Bushby  
Last review date: 01 July 2021

Ratified date: 01 March 2023  
Next review date: 31 March 2024



## CONTENTS

1. Aims/ Retention Guidelines .....	2
2. Benefits of a Retention Schedule .....	2
3. Maintaining and Amending the Retention Schedule .....	3
4. Legislation and Guidance .....	3
5. Governance of the Academy Trust .....	4
6. Board of Directors, Members Meetings and Governing Body .....	6
7. Funding and Finance .....	10
8. Human Resources .....	19
9. Management of the Academy .....	24
10. Property Management.....	28
11. Pupil Management.....	30
12. Central Government and Local Authority .....	39

## CHANGES

Policy date	Summary of change	Author	Version	Review date
21/04/2020	Policy has been created. Policy extract from IRMS Academies Toolkit 2019 (Pages 61-102)	Kay Mabin CFO	1.0	31/08/2021
01/07/2021	Annual policy review	Kay Mabin CFO	1.1	31/08/2022
16/03/2023	Annual policy review	Apex HR Ltd	1.2	16/03/2024

### 1. AIMS/ RETENTION GUIDELINES

These retention guidelines are intended for use by Academy schools based in England and Wales. Academy schools based in Scotland should consult the Scottish Council on Archives retention documentation:

<http://www.scottisharchives.org.uk/scarrs/schedules>.

Under the Freedom of Information Act 2000, schools are required to maintain a retention schedule, listing the record series which the school creates in the course of 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.

Members of staff are expected to manage their current recordkeeping systems using the retention schedule and to take account of differing retention periods when creating new record keeping systems. The retention schedule refers to record series, regardless of the media in which they are stored.

### 2. BENEFITS OF A RETENTION SCHEDULE

There are numerous benefits which arise from the use of a complete 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 the General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000 legislation will be available when required.

The school is not maintaining and storing information unnecessarily.

### 3. 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 periods for the various record series created and maintained by Academies 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. Every effort has been made to ensure that these retention periods are compliant with the requirements of the General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000.

Managing record series using these retention guidelines will be deemed to be “normal processing” under the legislation mentioned above. If record series are to be kept for longer or shorter periods than those laid out in this document, the reasons for this need to be documented.

This schedule should be reviewed on a regular basis.

This document is a guideline only and liability falls on the end user and not on the IRMS. Individual organisations should seek appropriate legal advice as well as senior management approval. If required, Academies should consider purchasing a complete retention schedule. The IRMS can supply details of retention schedules which are available for sale.

The IRMS can only guarantee that these retention periods were correct at the time of going to press and that the retention schedule will be reviewed in a phased programme.

Unless there is significant change in legislation, this retention schedule will be reviewed in 2022.

<http://www.irms.org.uk/join>

### 4. LEGISLATION AND GUIDANCE

Guidance provided by IRMS and under Freedom of Information Act 2000 and Data Protection Act 2018.

#### 1. GOVERNANCE, FUNDING AND FINANCIAL MANAGEMENT OF THE ACADEMY TRUST

Academies are governed by the Academy Trust, which will usually be a company limited by guarantee<sup>1</sup>. The Academy Trust may also be a charitable trust.

<sup>1</sup>A company limited by guarantee does not usually have a share capital or shareholders, but instead has members who act as guarantors. The guarantors give an undertaking to contribute a nominal amount (typically very small) in the event of winding up of the company. In the case of an Academy, the guarantors will guarantee the sum of £10 each.

## 5. 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
5.1. Governance Statement	No		Life of governance statement + 6 years	SECURE DISPOSAL
5.2. Article of Association	No		Life of the Academy	
5.3. Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL
5.4. Memorandum of Understanding of Shared Governance among Schools	No	<i>Companies Act 2006 section 335</i>	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL
5.5. Constitution	No		Life of Academy	
5.6. Special Resolutions to amend the Constitution	No		Life of the Academy	
5.7. Written Scheme of Delegation	No	<i>Companies Act 2006 section 335</i>	Life of Written Scheme of Delegation + 10 Years	SECURE DISPOSAL
5.8. Directors- Appointment	No		Life of appointment + 6 years	SECURE DISPOSAL
5.9. Directors- Disqualification	No	<i>Company Directors Disqualification Act 1986</i>	Date of disqualification + 15 years	SECURE DISPOSAL
5.10. Directors- Termination of Office	No		Date of termination + 6 Years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
5.11. Annual Report- Trustees Report	No	<i>Companies Act 2006 section 335</i> <i>Companies Act 2006 section 335</i> <i>Companies Act 2006 section 335</i>	Date of report + 10 years	SECURE DISPOSAL
5.12. Annual report and Accounts	No		Date of report + 10 years	SECURE DISPOSAL
5.13. Annual Return	No		Date of report + 10 years	SECURE DISPOSAL
5.14. Appointment of Trustees and Governors and Directors	Yes		Life of appointment + 6 years	SECURE DISPOSAL
5.15. Statement of Trustees Responsibilities	No		Life of appointment + 6 years	SECURE DISPOSAL
5.16. Appointment and removal of Members	No		Life of appointment + 6 years	SECURE DISPOSAL
5.17. Strategic Review	No		Life of appointment + 6 years	SECURE DISPOSAL
5.18. Strategic Plan (also known as School Development Plans)	No		Life of plan + 6 years	SECURE DISPOSAL
5.19. Accessibility Plan	There may be if the plan refers to specific pupils	<i>Limitation Act of 1980 (section 2)</i>	Life of plan + 6 years	SECURE DISPOSAL

## 6. BOARD OF DIRECTORS, MEMBERS MEETINGS AND GOVERNING BODY

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Board of Directors</b>				
6.1. Board Meeting Minutes	Could be if the minutes refer to living individuals	<i>Companies Act 2006 section 248</i>	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
6.2. Board decisions	Could be if the decisions refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
6.3. Board Meeting: Annual Schedule of Business	No		Current year	SECURE DISPOSAL
6.4. Board Meeting: Procedures for conduct of meeting	No	<i>Limitation Act 1980 (section 2)</i>	Date procedures superseded + 6 years	SECURE DISPOSAL
<b>Committees<sup>2</sup></b>				
6.5. Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES

<sup>2</sup>The board can establish any committee and determine the constitution, membership and proceedings that will apply.

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>General Members' Meeting</b>				
6.6. Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	<i>Companies Act 2006 section 248</i>	Minutes must be kept for at least 10 years from the date of the meeting <sup>3</sup>	OFFER TO ARCHIVES
6.7. Records relating to the management of the Annual General Meeting <sup>4</sup>	Could be if the minutes refer to living individuals	<i>Companies Act 2006 section 248</i>	Minutes must be kept for at least 10 years from the date of the meeting <sup>5</sup>	OFFER TO ARCHIVES
6.8. Agendas for Governing Body Meetings	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL <sup>6</sup>
6.9. Minutes off, and papers considered at, meetings of the Governing Body and its committee	May be data protection issues, if the meeting is dealing with confidential issues relating to staff			
Principal Set (signed)			Life of the Academy	
Inspection copies <sup>7</sup>			Date of meeting + 3 years	SECURE DISPOSAL

<sup>3</sup> The signed minutes must be kept securely together with notice and agenda for the meeting and support documentation provided for consideration at the meeting. Documentation is generally filled in a dedicated minute book, which is usually in the form of a loose-leaf binder to which additional pages can be easily added.

<sup>4</sup> Not all Academies are required to hold an annual General Meeting for the Members- the requirement will be stated in the Constitution

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

<sup>6</sup> 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

<sup>7</sup> 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

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
6.10. Reports presented to the Governing Body	May be data protection issues, if the report deals with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy	SECURE DISPOSAL Or Retain with the signed set of minutes
6.11. Meeting papers relating to the annual parents' meeting held under Section 33 of the Education Act 2002	No	<i>Education Act 2002 section 33</i>	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
6.12. Trust and Endowments managed by the Governing Body	No		PERMANENT	
6.13. Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL
6.14. Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	<i>Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171</i>	Date of report + 10 years	SECURE DISPOSAL



Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Statutory Registers <sup>8</sup></b>				
<b>6.15.</b> Registers of Directors		<i>Companies Act 2006</i>	Life of the Academy + 6 years	SECURE DISPOSAL
<b>6.16.</b> Register of Directors' interests (this is not a statutory register)			Life of the Academy + 6 years	SECURE DISPOSAL
<b>6.17.</b> Register of Directors' residential addresses		<i>Companies Act 2006</i>	Life of the Academy + 6 years	SECURE DISPOSAL
<b>6.18.</b> Register of gifts, hospitality and entertainments		<i>Companies Act 2006</i>	Life of the Academy + 6 years	SECURE DISPOSAL
<b>6.19.</b> Register of members		<i>Companies Act 2006</i>	Life of the Academy + 6 years	SECURE DISPOSAL
<b>6.20.</b> Register of secretaries		<i>Companies Act 2006</i>	Life of the Academy + 6 years	SECURE DISPOSAL
<b>6.21.</b> Register of Trustees interests			Life of the Academy + 6 years	SECURE DISPOSAL
<b>6.22.</b> Declaration of Interests Statement (Governors) (This is not a statutory register)			Life of the Academy + 6 years	SECURE DISPOSAL

<sup>8</sup> Academies are required by law to keep specific records, collectively known as statutory registers or the statutory books. The registers record information relating to the Academy's operations and structure, such as the current directors. Records should be kept up-to-date to reflect any changes that take place.

## 7. FUNDING AND FINANCE

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Strategic Finance</b>				
<b>7.1.</b> Statement of financial activities for the year	No		Life of the Academy + 6 years	SECURE DISPOSAL
<b>7.2.</b> Financial planning	No		Life of the Academy + 6 years	SECURE DISPOSAL
<b>7.3.</b> Value for money statement	No		Life of the Academy + 6 years	SECURE DISPOSAL
<b>7.4.</b> Records relating to the management of VAT	No		Life of the Academy + 6 years	SECURE DISPOSAL
<b>7.5.</b> Whole of government accounts returns	No		Life of the Academy + 6 years	SECURE DISPOSAL
<b>7.6.</b> Borrowing powers	No		Life of the Academy + 6 years	SECURE DISPOSAL
<b>7.7.</b> Budget plan	No		Life of the Academy + 6 years	SECURE DISPOSAL
<b>7.8.</b> Charging and remissions policy	No		Date policy superseded + 3 years	SECURE DISPOSAL

### Audit Arrangements

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>7.9.</b> Audit Committee and appointment of responsible officers	No		Life of the Academy	SECURE DISPOSAL
<b>7.10.</b> Independent Auditor's report on financial statements	No		Life of the Academy + 6 years	SECURE DISPOSAL
<b>7.11.</b> Independent Auditor's report on financial statements	No		Life of the Academy + 6 years	SECURE DISPOSAL
Funding Agreements				
<b>7.12.</b> Funding Agreement with Secretary of State and supplemental funding agreements <sup>9</sup>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
<b>7.13.</b> Funding Agreement- Termination of the funding agreement <sup>10</sup>			Date of last payment of funding + 6 years	SECURE DISPOSAL
<b>7.14.</b> Funding Records- Capital Grant	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
<b>7.15.</b> Finding records- Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
<b>7.16.</b> Funding records- General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
<b>7.17.</b> Per pupil funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL

<sup>9</sup> Where there is multi-Academy governance.

<sup>10</sup> 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.

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>7.18. Exclusions Agreement</b> <sup>11</sup>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
<b>7.19. Funding Records</b> <sup>12</sup>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
<b>7.20. Gift Aid and Tax Relief</b>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
<b>7.21. Records relating to loans</b>	No		Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	SECURE DISPOSAL

<sup>11</sup> 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.

<sup>12</sup> 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].

### Payroll and Pensions

<b>7.22. Maternity Page Records</b>	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
<b>7.23. Records Held under Retirement Benefits Schemes (Information Powers Regulations 1995)</b>	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
<b>7.24. Management of the Teachers' Pension Scheme</b>	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
<b>7.25. Records relating to pension registration</b>	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
<b>7.26. Payroll records</b>	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL

**Risk management and Insurance**

<b>7.27. Insurance Policies</b>	No		Date the policy expires + 6 years	SECURE DISPOSAL
<b>7.28. Records relating to the settlement of insurance claims</b>	No		Date claim settled + 6 years	SECURE DISPOSAL
<b>7.29. Employer's Liability Insurance Certificate</b>	No		Closure of school + 40 years	SECURE DISPOSAL

**Endowment Funds and Investments**

<b>7.30. Investment policies</b>	No		Life of the investment + 6 years	
<b>7.31. Management of Endowment Funds</b>	No		Life of the fund + 6 years	

**Accounts and Statements**

<b>7.32. Annual accounts</b>	No		Current year + 6 years	STANDARD DISPOSAL
<b>7.33. Loans and grants managed by the school</b>	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
7.34. Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
7.35. All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL
7.36. Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
7.37. Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
7.38. Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL
<b>Contract Management</b>				
7.39. All records relating to the management of contracts under seal	No	<i>Limitation Act 1980</i>	Last payment on the contract + 12 year	SECURE DISPOSAL
7.40. All records relating to the management of contracts under signature	No	<i>Limitation Act 1980</i>	Last payment on the contract + 6 years	SECURE DISPOSAL
7.41. Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Asset Management</b>				
<b>7.42.</b> Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
<b>7.43.</b> Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL
<b>7.44.</b> Records relating to the leasing of shared facilities, such as sports centres	No		Current year + 6 years	SECURE DISPOSAL
<b>7.45.</b> Land and building valuations	No		Date valuation superseded + 6 years	SECURE DISPOSAL
<b>7.46.</b> Disposal of assets	No		Date asset disposed of + 6 years	SECURE DISPOSAL
<b>7.47.</b> Community School leases for land	No		Date lease expires + 6 years	SECURE DISPOSAL
<b>7.48.</b> Commercial transfer arrangements	No		Date of transfer + 6 years	SECURE DISPOSAL
<b>7.49.</b> Transfer of land to the Academy Trust	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL
<b>7.50.</b> Transfers of freehold land	No		Land of land ownership then transfer to new owner	SECURE DISPOSAL



Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>School Fund</b>				
7.51. School Fund - Cheque books	No		Current year + 6 years	SECURE DISPOSAL
7.52. School Fund - Paying in books	No		Current year + 6 years	SECURE DISPOSAL
7.53. School fund – Ledger	No		Current year + 6 years	SECURE DISPOSAL
7.54. School Fund – Invoices	No		Current year + 6 years	SECURE DISPOSAL
7.55. School Fund - Receipts	No		Current year + 6 years	SECURE DISPOSAL
7.56. School Fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL
7.57. School Fund – Journey books	No		Current year + 6 years	SECURE DISPOSAL
<b>School Meals <sup>13</sup></b>				
7.58. Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
7.59. School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL
7.60. School meals summary sheets	No		Current year + 3 years	SECURE DISPOSAL

<sup>13</sup>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.

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Policies, Frameworks and Overarching Requirements</b>				
<b>7.61.</b> Data Protection Policy, including data protection notification	No		Date policy superseded + 6 years	SECURE DISPOSAL
<b>7.62.</b> Freedom of Information Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
<b>7.63.</b> Information Security Breach Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
<b>7.64.</b> Special Education Needs Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
<b>7.65.</b> Complaints Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
<b>7.66.</b> Risk and Control Framework	No		Life of Framework + 6 years	SECURE DISPOSAL
<b>7.67.</b> Rules and Bylaws	No		Date rules or bylaws superseded + 6 years	SECURE DISPOSAL
<b>7.68.</b> Home School Agreements <sup>14</sup>	No		Date of statement + 6years	SECURE DISPOSAL

<sup>14</sup> this should be drawn up in consultation with parents and should apply to all pupils.

## 8. HUMAN RESOURCES

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Recruitments <sup>15</sup></b>				
<b>8.1.</b> All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment + 6 years	SECURE DISPOSAL
<b>8.2.</b> All records leading up to the appointment of a new member of staff – successful candidate	Yes		All relevant information should be added to the Staff Personal File ( see below) and all other information retained for 6 months	SECURE DISPOSAL
<b>8.3.</b> Pre- employment vetting information – DBS checks <sup>16</sup>	No	<i>DBS Update Service Employer Guide June 2014</i>	The organisation should take a copy of the DBS certificate when it is shown to them by the individual and should be added to the Staff Personal file	SECURE DISPOSAL
<b>8.4.</b> Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Where possible, these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File	SECURE DISPOSAL
<b>8.5.</b> Pre-employment vetting information- evidence proving the right to work in the United Kingdom <sup>17</sup>	Yes	<i>An employer’s guide to right to work checks (Home Office May 2015)</i>	Where possible, these documents should be added to the Staff personal File, but if they are kept separately, then the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL

<sup>16</sup> Academies are bound by the legislation that applies to independent schools NOT maintained schools

<sup>17</sup> Employers are required to take a “clear copy” of the documents which they are shown as part of this process

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
8.6. 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 documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
8.7. Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL
8.8.				
<b>Operational Staff Management</b>				
8.9. Staff Personal file, including employment contract and staff training records	Yes	<i>Limitation Act 1980 section 2</i>	Termination of employment + 6 years	SECURE DISPOSAL
8.10. Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
8.11. Annual appraisal/assessment records	Yes		Current year + 5 years	SECURE DISPOSAL
8.12. Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	SECURE DISPOSAL
8.13. Training needs analysis	No		Current year + 1 year	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Management of Disciplinary and Grievance Processes</b>				
<p><b>8.14.</b> Allegations which is child protection in nature against a member of staff, including where the allegation is unfounded <sup>18</sup></p>	Yes	<p><i>“Keep Children Safe in Education” Statutory guidance for schools and colleges 2015.</i>  <i>“working together to Safeguard Children” A guide to inter-agency working to safeguard and promote the welfare of children March 2015</i></p>	Until the person’s normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	SECURE DISPOSAL These records must be shredded
<p><b>8.15.</b> Disciplinary Proceedings</p>	Yes			
<ul style="list-style-type: none"> <li>• Oral warning</li> </ul>			Date of warning <sup>19</sup> + 6 months	SECURE DISPOSAL <sup>20</sup>

<sup>18</sup> 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.

<sup>19</sup> 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.

<sup>20</sup> If warnings are placed on personal files, then they must be weeded from the file.

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<ul style="list-style-type: none"> <li>Written warning- Level 1</li> </ul>			Date of warning + 6 months	SECURE DISPOSAL <sup>21</sup>
<ul style="list-style-type: none"> <li>Written warning- Level 2</li> </ul>			Date of warning + 12 months	
<ul style="list-style-type: none"> <li>Final warning</li> </ul>			Date of warning +18 months	
<ul style="list-style-type: none"> <li>Case not found</li> </ul>			If the incident is child protection related, then see above, otherwise, dispose of at the conclusion of the case	

<sup>21</sup> If warnings are placed on personal files, then they must be weeded from the file.

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Health and Safety</b>				
<b>8.16.</b> Health and Safety policy statements	No		Life of policy + 3 years	SECURE DISPOSAL
<b>8.17.</b> Health and Safety risk assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
<b>8.18.</b> 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

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>8.19. Accident reporting</b>	Yes	<i>Social Security (Claims and Payments) Regulations 1979, Regulation 25. Social Security Administration Act 1992 section 8. Limitation Act 1980</i>	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 have retained as below	
• Adults			Date of incident + 6 years	SECURE DISPOSAL
• Children			Date of birth of the child + 25 years	SECURE DISPOSAL
<b>8.20. Control of Substances Hazardous to Health (COSHH)</b>	No		Current year + 10 years then REVIEW	SECURE DISPOSAL
<b>8.21. Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos</b>	No		Last action + 40 years	SECURE DISPOSAL
<b>8.22. Process of monitoring of areas where employees and persons are likely to have come into contact with radiation</b>	No		Last action + 50 years	SECURE DISPOSAL

<b>8.23.</b> Fire precautions log books	No		Current year + 6 years	SECURE DISPOSAL
<b>8.24.</b> Fire risk assessments	No	<i>Fire Service order 2005</i>	Life of the risk assessment + 6 years	SECURE DISPOSAL
<b>8.25.</b> Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL

## 9. MANAGEMENT OF THE ACADEMY

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Admissions</b>				
<b>9.1.</b> All records relating to the creation and implementation of the School Admissions' Policy	No	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panel Dec 2014</i>	Life of the policy + 3 years then REVIEW	SECURE DISPOSAL
<b>9.2.</b> Admissions- if the admission is successful	Yes		Date of admission + 1 year	SECURE DISPOSAL
<b>9.3.</b> Admissions- if the appeal is unsuccessful	Yes		Resolution of case + 1 year	SECURE DISPOSAL
<b>9.4.</b> Register of admissions	Yes	<i>School attendance: Departmental advice for maintained schools, Academies independent schools and local authorities Oct 14</i>	Every entry in the admission register must be preserved for a period of 3 years after the date on which was entry was made <sup>24</sup>	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



Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
9.5. Admissions – Secondary Schools- Casual	Yes		Current year + 1 year	SECURE DISPOSAL
9.6. Proof of address supplied by parents as part of the admissions process	Yes	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014</i>	Current year + 1 year	SECURE DISPOSAL
9.7. Supplementary information form, including additional information such as religion and medical conditions	Yes			
<ul style="list-style-type: none"> <li>For successful admissions</li> </ul>			This information should be added to the pupil file	SECURE DISPOSAL
<ul style="list-style-type: none"> <li>For unsuccessful admissions</li> </ul>			Until appeals process completed	SECURE DISPOSAL

<sup>24</sup> School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2024 p6

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Head Teach and Senior Management Team</b>				
9.8. Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then REVIEW	These could be of permanent historical value and should be offered to the County Archives Service, if appropriate
9.9. Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL
9.10. 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 + minimum of 3 years then REVIEW	SECURE DISPOSAL
9.11. Records created by Head Teacher, Deputy Head Teachers, head of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then REVIEW	SECURE DISPOSAL
9.12. Correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Life of the plan + 6 years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Operational Administration</b>				
9.13. Management of complaints	Yes		Date complaint was resolved + 3 years	SECURE DISPOSAL
9.14. Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	SECURE DISPOSAL
9.15. Records relating to the management of software licences	No		Date licence expires + 6 years	SECURE DISPOSAL
9.16. General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
9.17. Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
9.18. Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year +1 year	STANDARD DISPOSAL
9.19. Newsletters and other items with a short operation use	No		Current year + 1 year	STANDARD DISPOSAL
9.20. Visitors' book and signing in sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
9.21. Records relating to the creation and management of Parent Teacher Associations and/or old Pupil Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL

## 10. PROPERTY MANAGEMENT

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Property Management</b>				
<b>10.1.</b> Title deed of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry	
<b>10.2.</b> 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	
<b>10.3.</b> Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
<b>10.4.</b> Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
<b>10.5.</b> Business continuity and disaster recovery plans	No		Date the plan superseded + 3 years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Maintenance</b>				
<b>10.6.</b> All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
<b>10.7.</b> 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

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Fleet Management</b>				
<b>10.8.</b> The process of acquisition and disposal of vehicles through lease or purchase, e.g, contracts/leases, quotes, approval	No	<i>Limitation Act 1980 section 2</i>	Disposal of vehicle + 6 years	SECURE DISPOSAL
<b>10.9.</b> The process of managing allocation and maintenance of vehicles, e.g., list of who was driving the vehicles and when, maintenance	No	<i>Limitation Act 1980 Section 2</i>	Disposal of vehicle + 6 years	SECURE DISPOSAL
<b>10.10.</b> Service logs and vehicle logs	No	<i>Limitation Act 1980 section 2</i>	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	SECURE DISPOSAL
<b>10.11.</b> GPS tracking data relating to the vehicles	No	<i>Limitation Act 1980</i>	Date of journey + 6 years	SECURE DISPOSAL

## 11. PUPIL MANAGEMENT

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Pupil's Education Record</b>				
<b>11.1.</b> Pupil Educational Record required by The Education (Pupil Information (England) Regulations 2005	Yes	<i>The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437</i>		

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<ul style="list-style-type: none"> <li>Primary</li> </ul>			Retain whilst the child remains at 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"> <li>To another primary school</li> <li>To a secondary school</li> <li>To a pupil referral unit</li> </ul> <p>If the pupil died whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period.</p> <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.</p> <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the records to the LA, as it is more likely that the pupil will request the record from the LA</p>

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<ul style="list-style-type: none"> <li>Secondary</li> </ul>		<i>Limitation Act 1980 Section 2</i>	Date of birth of the pupil involved + 25 years	SECURE DISPOSAL
<b>11.2.</b> Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	SECURE DISPOSAL
<b>11.3.</b> Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be retained	
<b>11.4.</b> Examination results- pupil copies	Yes			
<ul style="list-style-type: none"> <li>Public</li> </ul>			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
<ul style="list-style-type: none"> <li>Internal</li> </ul>			This information should be added to the pupil file	
<b>11.5.</b> Child protection information held on pupil file	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>	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
<b>11.6.</b> Child protection information held in separate file	Yes		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 DISPOSAL- these records MUST be shredded



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

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

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Attendance</b>				
11.7. Attendance registers	Yes	<i>School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities</i>	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	SECURE DISPOSAL
11.8. Correspondence relating to authorised absence		<i>Education Act 1996 Section 7</i>	Current academic year + 2 years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Special Educational Needs</b>				
<p><b>11.9.</b> Special Educational Needs files, reviews and Individual Education Plans</p>	Yes	<i>Limitation Act 1980</i>	Date of birth of the pupil + 25 years	<p>REVIEW</p> <p>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</p>
<p><b>11.10.</b> Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement</p>	Yes	<i>Education Act 1996 Special Educational needs and Disability Act 2001 Section 1</i>	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
<p><b>11.11.</b> Advice and information provided to parents regarding educational needs</p>	Yes	<i>Education Act 1996 Special Educational needs and Disability Act 2001 Section 2</i>	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

11.12. Accessibility strategy	Yes	<i>Special Educational Needs and Disability Act 2001 Section 14</i>	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
-------------------------------	-----	---	---	---

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Statistics and Management Information</b>				
11.13. Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
11.14. Examination results (schools copy)	Yes		Current year + 6 years	SECURE DISPOSAL
11.15. SATs records	Yes			
<ul style="list-style-type: none"> <li>Results</li> </ul>			<p>The SATs results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25.</p> <p>The school may wish to keep a composite record of all the whole year SATs results. These could be kept for the current year + 6 years to allow suitable comparison</p>	SECURE DISPOSAL
<ul style="list-style-type: none"> <li>Examination papers</li> </ul>			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL

<b>11.16.</b> Published Admission Number (PAN) reports	Yes		Current year + 6 years	SECURE DISPOSAL
<b>11.17.</b> Value added and contextual data	Yes		Current year + 6 years	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Implementation of Curriculum</b>				
<b>11.18.</b> Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL
<b>11.19.</b> Timetable	No		Current year + 1 year	
<b>11.20.</b> Class record books	No		Current year + 1 year	
<b>11.21.</b> Mark books	No		Current year + 1 year	
<b>11.22.</b> Record of homework set	No		Current year + 1 year	
<b>11.23.</b> Pupils' work	No		Where possible, work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Educational visits outside the classroom</b>				
11.24. Records created by schools in order to obtain approval to run an educational visit outside the classroom- Primary schools	No	<i>Outdoor Education Advisers' Panel National Guidance website</i>	Date of visit + 14 years	SECURE DISPOSAL
11.25. Records created by schools in order to obtain approval to obtain approval to run an educational visit outside the classroom- Secondary schools	No	<i>website <a href="http://oeapng.in">http://oeapng.in</a> fo specifically Section 3 – "Legal Framework and Employer systems" and Section 4 – "Good Practice".</i>	Date of visit + 10 years	SECURE DISPOSAL
11.26. Parental consent forms for school trip where there has been no major incident <sup>25</sup>	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 school do not have the storage capacity to retain every single consent form issued by the school for this period of time

<b>11.27.</b> Parental permission slips for school trips- where there has been a major incident	Yes		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 have been followed for all pupils	
<b>11.28.</b> Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL

<sup>25</sup> 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](http://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.

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Walking Bus</b>				
<b>11.29.</b> Walking bus registers	Yes		Date of register + 3 years This takes into account the fact that, if there is an incident requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL (If these records are retained electronically any backup copies should be destroyed at the same time)

## 12. CENTRAL GOVERNMENT AND LOCAL AUTHORITY

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Local Authority</b>				
<b>12.1.</b> Secondary transfer sheets (primary)	Yes		Current year + 2 years	SECURE DISPOSAL
<b>12.2.</b> Attendance returns	Yes		Current year + 1 year	SECURE DISPOSAL
<b>12.3.</b> School census returns	No		Current year + 5	SECURE DISPOSAL

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at End of Administrative Life of the Record
<b>Central Government</b>				
<b>12.4.</b> OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL
<b>12.5.</b> Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL
<b>12.6.</b> Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL