



EBOR ACADEMY TRUST

Policy Number

19B

Data Retention Policy and Schedule

Approved By: Standards Committee

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Statement of intent

Ebor Academy Trust is committed to maintaining the confidentiality of its information and ensuring that all records within the Academy Trust are only accessible by the appropriate individuals. In line with the requirements of the General Data Protection Regulation (GDPR), the Academy Trust also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

The Academy Trust has created this policy to outline how records are stored, accessed, monitored, retained and disposed of, in order to meet the Academy Trust statutory requirements.

This document complies with the requirements set out in the GDPR, effective since 25th May 2018.

1. Legal framework

This policy has due regard to legislation including, but not limited to, the following:

- General Data Protection Regulation (2018)
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- Data Protection Act 2018
- Human Rights Act 1998
- Defamation Act 2013
- Privacy and Electronic Communications Regulations 2003

This policy will be implemented in accordance with the following Academy Trust policies and procedures:

- Data Protection Policy
- Freedom of Information Policy
- E-Safety Policy
- Data Breach Management Policy

2. Responsibilities

The Academy Trust as a whole has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.

The Ebor Academy Trustees hold overall responsibility for this policy and for ensuring it is implemented correctly.

The Headteacher of the School has responsibility to maintain the School records and recordkeeping systems in accordance with the regulatory environment specific to the School. The **Data Protection Officer (DPO)** is responsible for promoting compliance with this policy and reviewing the policy in conjunction with the Academy Trustees.

The Headteacher is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of correctly in line with the Records Retention Schedule (Appendix 1-8)
SLT members are responsible for enforcing compliance with this policy.

All staff members are responsible for ensuring that any records for which they are responsible for are accurate, maintained securely and disposed of correctly in line with the Records Retention Schedule and properly document their actions and decisions.

3. Management of pupil records

Pupil records are specific documents that are used throughout a pupil's time in the education system – they are passed to each School that a pupil attends and includes all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.

The following information is stored on the front of a pupil record, and will be easily accessible:

Forename, surname, gender and date of birth

- Unique pupil number
- Note of the date when the file was opened
- Note of the date when the file was closed, if appropriate

The following information is stored inside the front cover of a pupil record, and will be easily accessible:

- Ethnic origin, religion and first language (if not English)
- Any preferred names
- Position in their family, e.g. eldest sibling
- Emergency contact details and the name of the pupil's doctor
- Any allergies or other medical conditions that are important to be aware of
- Names of adults with parental responsibility/care for the pupil, including their home addresses and telephone numbers
- Name of the Academy, admission number, the date of admission and the date of leaving, where appropriate

- Any other agency involvement, e.g. speech and language therapist
- Reference to any other linked files

The following information is stored in a pupil record and will be supplied if a Subject Access request is received for the pupil record:

- Admissions form
- Statement/plans for educational support eg SEND, speech and language
- If the pupil has attended an early years setting, the record of transfer
- Annual written reports to parents
- National curriculum and agreed syllabus record sheets
- Notes relating to major incidents and accidents involving the pupil
- Any information about an education and healthcare plan (EHCP) and support offered in relation to the EHCP
- Any notes indicating child protection disclosures and reports are held
- Any information relating to exclusions
- Any correspondence with parents or external agencies relating to major issues, e.g. mental health
- Notes indicating that records of complaints made by parents or the pupil are held
- Current data collection sheet
- The following information is subject to shorter retention periods and, therefore, will be stored separately in a personal file for the pupil in the Academy office:
 - Absence notes
 - Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
 - Correspondence with parents about minor issues, e.g. behaviour

Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope, in a securely locked filing cabinet in the Academy office – a note indicating this is marked on the pupil's file.

Hard copies of complaints made by parents or pupils are stored in a file in the Headteacher's office – a note indicating this is marked on the pupil's file.

Actual copies of accident and incident information are stored separately on the Academy Trusts accident reporting system and held in line with the retention periods outlined in this policy (Appendix 1) – a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.

The school will ensure that no pupil records are altered or amended before transferring them to the next education establishment that the pupil will attend.

Electronic records relating to a pupil's record will also be securely transferred to the pupils' next education establishment.

The Academy will not keep any copies of information stored within a pupil's record, unless there is ongoing legal action at the time during which the pupil leaves the Academy. The responsibility for these records will then transfer to the next education establishment that the pupil attends.

The school will, wherever possible, avoid sending a pupil's record by post. Where a pupil's record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The next education establishment it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the Academy.

4. Records Not Forming Part of the Pupil Record

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

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

5. Storage and Security

All pupil records and associated information should be stored securely to maintain confidentiality, whilst keeping information accessible to those authorised to see it. Electronic records should have appropriate security and access controls in place; equally, paper records should be kept in lockable storage areas with restricted access. Not everyone in a School has a need to access all of the information held about a pupil; this is particularly relevant to child protection information [see also the section on Information Security in this toolkit].

6. Transfer of Pupil Records

It is vital to ensure swift transfers of information to the new School to ensure appropriate decisions can be made regarding a pupil, using relevant and accurate information. The following should be transferred to the next school within 15 school days of receipt of confirmation that a pupil is registered at another school:

- Common Transfer File (CTF) from the School Information Management System via the school2school system, when used
- Any elements of the pupil record, held in any format, not transferred as part of the CTF
- SEN or other support service information, including behaviour, as only limited information may be included in the CTF
- Child protection information; this must be sent securely as soon as possible by the Designated Safeguarding Lead (DSL) or a member of their team to their equivalent at the new School.

Schools must ensure the information is kept secure and traceable during transfer:

- Records can be delivered or collected in person, with signed confirmation for tracking purposes
- Pupil records should not be sent by post. If the use of post is absolutely necessary, records should be sent by 'Special Delivery Guaranteed' or via a reputable and secure courier to a pre-informed named contact, along with a list of the enclosed files. The new school should sign a copy of the list to confirm receipt of the files and securely return to the previous school
- If held electronically, records may be sent to a named contact via secure encrypted e-mail, or other secure transfer method

If the pupil is transferring to an independent school, the existing School should transfer copies of relevant information only and retain the original full record as the last known School.

If a request is received to transfer the pupil record or other information about a pupil to a school outside of the European Union (EU), schools should contact the Local Authority or their Data Protection Officer for further advice

7. Records Relating to Sexual abuse

Schools must retain all records which contain information about allegations of the sexual abuse of pupils. These records should be kept indefinitely as long as the [Independent Inquiry into Child Sexual Abuse](#) is active.

8. Disposal of data

Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.

Where disposal of information is outlined as secure disposal, hard copies will be shredded. Deletion of electronic data should be suitable for the type of information. The School's IT provider will advise on the most appropriate up to date method of deletion from: overwriting, degaussing, physical destruction, dismantling, sanding or submerging in water (USBs). The Scholl Business Partner (SBP)/DPO will keep a Data Destruction Log to record of all files that have been destroyed.

Where an external provider is used to destroy confidential hard copy waste, the records should be shredded on site. The provider should produce a certificate of destruction. Staff working for the external provider should be trained in the handling of confidential documents and this should be confirmed with the provider. A contract must be in place between the data controller (the school) and the processor (the contractor) which outlines their obligations, responsibilities and liabilities.

Where the disposal action is indicated as reviewed before it is disposed, the Safeguarding Lead/ SENCO/ DPO will review the information ~~against its administrative value~~ – if the information should be kept, the SBP will keep a record of this.

If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

Where information has been kept for administrative purposes, the Safeguarding Lead/ SENCO will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.

Where information must be kept permanently, this information is exempt from the normal review procedures

Appendix 1: Data Retention periods Governance, Funding and Financial Management of the School Trust

Academies are governed by the School Trust, which will usually be a company limited by guarantee¹. The School Trust may also be a charitable trust.

1.1 Governance of the School Trust					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.1.1	Governance Statement	No		Life of governance statement + 6 years	SECURE DISPOSAL
1.1.2	Articles of Association	No		Life of the School	
1.1.3	Memorandum of Association	No		This can be disposed of once the School has been incorporated	SECURE DISPOSAL
1.1.4	Memorandum of Understanding of Shared Governance among Schools	No	<i>Companies Act 2006 section 355</i>	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL

¹ 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 a school, the guarantors will guarantee the sum of £10 each.

1.1 Governance of the School Trust

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.1.5	Constitution	No		Life of the School	
1.1.6	Special Resolutions to amend the Constitution	No		Life of the School	
1.1.7	Written Scheme of Delegation	No	<i>Companies Act 2006 section 355</i>	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL
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	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.12	Annual Report and Accounts	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL

1.1 Governance of the School Trust

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.1.1 3	Annual Return	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.1 4	Appointment of Trustees and Governors and Directors	Yes		Life of appointment + 6 years	SECURE DISPOSAL
1.1.1 5	Statement of Trustees Responsibilities	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.1 6	Appointment and removal of Members	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.1 7	Strategic Review	No		Date of the review + 6 years	SECURE DISPOSAL
1.1.1 8	Strategic Plan [also known as School Development Plans]	No		Life of plan + 6 years	SECURE DISPOSAL
1.1.1 9	Accessibility Plan	There may be if the plan refers to specific pupils	Limitation Act 1980 (Section 2)	Life of plan + 6 years	SECURE DISPOSAL

1.2 Board of Directors, Members Meetings and Governing Body

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	Board of Directors				
1.2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.2	Board Decisions	Could be if the decisions refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.3	Board Meeting: Annual Schedule of Business	No		Current year	SECURE DISPOSAL
1.2.4	Board Meeting: Procedures for conduct of meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	SECURE DISPOSAL
	Committees²				

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

1.2 Board of Directors, Members Meetings and Governing Body

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.5	Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
	General Members' Meeting				
1.2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting ³	OFFER TO ARCHIVES
1.2.7	Records relating to the management of the Annual General Meeting ⁴	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting ⁵	OFFER TO ARCHIVES

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

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

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

1.2 Board of Directors, Members Meetings and Governing Body

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	Governors				
1.2.8	Agendas for Governing Body meetings	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL ⁶
1.2.9	Minutes of, and papers considered at, meetings of the Governing Body and its committees	May be data protection issues, if the meeting is dealing with confidential issues relating to staff			
	Principal Set (signed)			Life of School	

⁶ In this context, SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross-cut shredder.

1.2 Board of Directors, Members Meetings and Governing Body

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	Inspection Copies ⁷			Date of meeting + 3 years	SECURE DISPOSAL
1.2.10	Reports presented to the Governing Body	May be data protection issues, if the report deals with confidential issues relating to staff		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 School	SECURE DISPOSAL or retain with the signed set of minutes
1.2.11	Meeting papers relating to the annual parents' meeting held under Section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL

⁷ These are the copies which the clerk to the Governor may wish to retain, so that requestors can view all the relevant information, without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

1.2 Board of Directors, Members Meetings and Governing Body

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.1 2	Trusts and Endowments managed by the Governing Body	No		PERMANENT	
1.2.1 3	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
1.2.1 4	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL

1.2 Board of Directors, Members Meetings and Governing Body

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	Statutory Registers⁸				
1.2.15	Register of Directors		Companies Act 2006	Life of the School + 6 years	SECURE DISPOSAL
1.2.16	Register of Directors' interests [this is not a statutory register]			Life of the School + 6 years	SECURE DISPOSAL
1.2.17	Register of Directors' residential addresses		Companies Act 2006	Life of the School + 6 years	SECURE DISPOSAL
1.2.18	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the School + 6 years	SECURE DISPOSAL
1.2.19	Register of members		Companies Act 2006	Life of the School + 6 years	SECURE DISPOSAL
1.2.20	Register of secretaries		Companies Act 2006	Life of the School + 6 years	SECURE DISPOSAL

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

1.2 Board of Directors, Members Meetings and Governing Body

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.2 1	Register of Trustees interests			Life of the School + 6 years	SECURE DISPOSAL
1.2.2 2	Declaration of Interests Statements [Governors] [this is not a statutory register]			Life of the School + 6 years	SECURE DISPOSAL

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

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	Audit Arrangements				
1.3.9	Audit Committee and appointment of responsible officers	No		Life of the School	SECURE DISPOSAL
1.3.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	SECURE DISPOSAL
1.3.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	SECURE DISPOSAL
	Funding Agreements				
1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements ⁹	No		Date of last payment of funding + 6 years	SECURE DISPOSAL

⁹ Where there is multi-School governance.

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.1 3	Funding Agreement – Termination of the funding agreement ¹⁰			Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.1 4	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.1 5	Funding Records – Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.1 6	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.1 7	Per pupil funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.1 8	Exclusions agreement ¹¹	No		Date of last payment of funding + 6 years	SECURE DISPOSAL

¹⁰ Either party may give not less than 7 financial years' written notice to terminate the Agreement, such notice to expire on 31 August. Or, where the School has significant financial issues or is insolvent, the Agreement can be terminated by the Secretary of State to take effect on the date of the notice.

¹¹ The School can enter into an arrangement with a Local Authority (LA), so that payment will flow between the School and the LA, in the same way as it would do were the School a maintained school.

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.19	Funding records ¹²	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.20	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.21	Records relating to loans	No		Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	SECURE DISPOSAL
	Payroll and Pensions				
1.3.22	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL

¹² Funding agreement which says that the School can receive donations and can only charge where the law allows maintained schools to charge [see Charging and Remission Policy].

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.2 3	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
1.3.2 4	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.2 5	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.2 6	Payroll records	Yes		Date payroll run + 6 years	SECURE DISPOSAL
	Risk Management and Insurance				
1.3.2 7	Insurance policies	No		Date the policy expires + 6 years	SECURE DISPOSAL

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

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.3 4	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.3 5	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL
1.3.3 6	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.3 7	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.3 8	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL

1.3 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	Contract Management				
1.3.39	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
1.3.40	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
1.3.41	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL
	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 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.4 4	Records relating to the leasing of shared facilities, such as sports centres	No		Current year + 6 years	SECURE DISPOSAL
1.3.4 5	Land and building valuations	No		Date valuation superseded + 6 years	SECURE DISPOSAL
1.3.4 6	Disposal of assets	No		Date asset disposed of + 6 years	SECURE DISPOSAL
1.3.4 7	Community School leases for land	No		Date lease expires + 6 years	SECURE DISPOSAL
1.3.4 8	Commercial transfer arrangements	No		Date of transfer + 6 years	SECURE DISPOSAL
1.3.4 9	Transfer of land to the School Trust	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL
1.3.5 0	Transfers of freehold land	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL

1.3 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	School Fund				
1.3.5 1	School Fund – Cheque books	No		Current year + 6 years	SECURE DISPOSAL
1.3.5 2	School Fund – Paying in books	No		Current year + 6 years	SECURE DISPOSAL
1.3.5 3	School Fund – Ledger	No		Current year + 6 years	SECURE DISPOSAL
1.3.5 4	School Fund – Invoices	No		Current year + 6 years	SECURE DISPOSAL
1.3.5 5	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
1.3.5 6	School Fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL
1.3.5 7	School Fund – Journey books	No		Current year + 6 years	SECURE DISPOSAL

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	School Meals¹³				
1.3.58	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
1.3.59	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.60	School meals summary sheets	No		Current year + 3 years	SECURE DISPOSAL

As a charity, a School 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 School. If the School operates a subsidiary company, it is expected that these records will be managed in line with standard business practice.

¹³ Unless it would be unreasonable to do so, school lunches should be provided when they are requested by, or on behalf of, any pupil. A school lunch must be provided free of charge to any pupil entitled to free school lunches. From September 2014, free school lunches must be provided to all KS1 pupils.

1.4 Policies, Frameworks and Overarching Requirements

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.4.1	Data Protection Policy, including data protection notification	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.2	Freedom of Information Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.3	Information Security Breach Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.4	Special Educational Needs Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.5	Complaints Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.6	Risk and Control Framework	No		Life of framework + 6 years	SECURE DISPOSAL
1.4.7	Rules and Bylaws	No		Date rules or bylaws superseded + 6 years	SECURE DISPOSAL
1.4.9	Home School Agreements ¹⁴	No		Date agreement revised + 6 years	SECURE DISPOSAL

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

1.4 Policies, Frameworks and Overarching Requirements					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.4.10	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	SECURE DISPOSAL

**Appendix 2
Human Resources**

2.1 Recruitment¹⁵					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL

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

2.1 Recruitment¹⁵

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks ¹⁶	No	DBS Update Service Employer Guide June 2014	The organisation should take a copy of the DBS certificate when it is shown to them by the individual and should be added to the Staff Personal File	SECURE DISPOSAL
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Where possible, these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File	SECURE DISPOSAL

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

2.1 Recruitment¹⁵

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ¹⁷	Yes	An employer’s guide to right to work checks [Home Office May 2015]	Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.7	Records relating to the employment of overseas teachers	Yes		Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.8	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL

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

2.1 Recruitment¹⁵

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

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.2.1	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980 (Section 2)	Termination of employment + 6 years	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal/assessment records	Yes		Current year + 5 years	SECURE DISPOSAL
2.2.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	SECURE DISPOSAL

2.1 Recruitment ¹⁵					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.2.5	Training needs analysis	No		Current year + 1 year	SECURE DISPOSAL

2.3 Management of Disciplinary and Grievance Processes					
	Basic file description	Data Protection Issues			
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded ¹⁸	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	Until the person’s normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	SECURE DISPOSAL These records must be shredded

¹⁸ 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.

2.3 Management of Disciplinary and Grievance Processes

	Basic file description	Data Protection Issues			
2.3.2	Disciplinary Proceedings	Yes			
	<ul style="list-style-type: none"> Oral warning 			Date of warning ¹⁹ + 6 months	SECURE DISPOSAL ²⁰
	<ul style="list-style-type: none"> Written warning – level 1 			Date of warning + 6 months	SECURE DISPOSAL ²¹
	<ul style="list-style-type: none"> Written warning – level 2 			Date of warning + 12 months	SECURE DISPOSAL ²²
	<ul style="list-style-type: none"> Final warning 			Date of warning + 18 months	SECURE DISPOSAL ²³

¹⁹ 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.

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

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

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

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

2.3 Management of Disciplinary and Grievance Processes

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

2.4 Health and Safety

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.4.1	Health and Safety policy statements	No		Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety risk assessments	No		Life of risk assessment + 3 years	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 Health and Safety

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.4.4	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below	
	<ul style="list-style-type: none"> Adults 			Date of incident + 6 years	SECURE DISPOSAL
	<ul style="list-style-type: none"> Children 			Date of birth of the child + 25 years	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No		Current year + 10 years then REVIEW	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No		Last action + 40 years	SECURE DISPOSAL

2.4 Health and Safety					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire precautions log books	No		Current year + 6 years	SECURE DISPOSAL
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

Appendix 3 Management of the School

3.1 Admissions

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
3.1.1	All records relating to the creation and implementation of the School Admissions' Policy	No	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then REVIEW	SECURE DISPOSAL
3.1.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL

3.1 Admissions

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
3.1.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
3.1.4	Register of admissions	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made ²⁴	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
3.1.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL

²⁴ School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014 p6.

3.1 Admissions

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
3.1.6	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL
3.1.7	Supplementary information form, including additional information such as religion and medical conditions	Yes			
	<ul style="list-style-type: none"> For successful admissions 			This information should be added to the pupil file	SECURE DISPOSAL
	<ul style="list-style-type: none"> For unsuccessful admissions 			Until appeals process completed	SECURE DISPOSAL

3.2 Head Teacher and Senior Management Team

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
3.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then REVIEW	These could be of permanent historical value and should be offered to the County Archives Service, if appropriate
3.2.2	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL
3.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then REVIEW	SECURE DISPOSAL
3.2.4	Records created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then REVIEW	SECURE DISPOSAL

3.2 Head Teacher and Senior Management Team					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
3.2.5	Correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL
3.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL

3.3 Operational Administration					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
3.3.1	Management of complaints	Yes		Date complaint resolved + 3 years	SECURE DISPOSAL
3.3.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	SECURE DISPOSAL
3.3.3	Records relating to the management of software licences	No		Date licence expires + 6 years	SECURE DISPOSAL
3.3.4	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL

3.3 Operational Administration					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
3.3.5	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
3.3.6	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
3.3.7	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
3.3.8	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
3.3.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL

Appendix 4. Property Management

This section covers the management of buildings and property.

4.1 Property Management					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
4.1.1	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry	
4.1.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold	
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
4.1.5	Business continuity and disaster recovery plans	No		Date the plan superseded + 3 years	SECURE DISPOSAL

4.2 Maintenance

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

4.3 Fleet Management

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.2	The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, maintenance	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL

4.3 Fleet Management					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
4.3.3	Service logs and vehicle logs	N	Limitation Act 1980 (Section 2)	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	SECURE DISPOSAL
4.3.4	GPS tracking data relating to the vehicles	N	Limitation Act 1980 (Section 2)	Date of journey + 6 years	SECURE DISPOSAL

Appendix 5 Pupil Management

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

5.1 Pupil's Educational Record

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

5.1 Pupil's Educational Record

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

5.1 Pupil's Educational Record

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	<ul style="list-style-type: none"> Internal 			This information should be added to the pupil file	
<p>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</p>					
5.1.5	Child protection information held on pupil file	Yes	<p>“Keeping children safe in education Statutory guidance for schools and colleges March 2015”;</p> <p>“Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”</p>	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 Pupil's Educational Record					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
5.1.6	Child protection information held in separate files	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	SECURE DISPOSAL – these records MUST be shredded

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

5.2 Attendance

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

5.3 Special Educational Needs

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time in order to defend themselves in a “failure to provide a sufficient education” case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period – this should be documented
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold

5.3 Special Educational Needs					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
5.3.4	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

Appendix 6. Curriculum Management

6.1 Statistics and Management Information

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination results (schools copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	SATs records –	Yes			
	<ul style="list-style-type: none"> Results 			<p>The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years</p> <p>The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison</p>	SECURE DISPOSAL
	<ul style="list-style-type: none"> Examination papers 			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) reports	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value added and contextual data	Yes		Current year + 6 years	SECURE DISPOSAL

6.1 Statistics and Management Information

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
6.1.5	Self-evaluation forms	Yes		Current year + 6 years	SECURE DISPOSAL

6.2 Implementation of Curriculum

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
6.2.1	Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.2	Timetable	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.3	Class record books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.4	Mark books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL

6.2 Implementation of Curriculum

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
6.2.5	Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.6	Pupils' work	No		Where possible, work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year	SECURE DISPOSAL
6.2.7	Consent forms			Parental consent will always expire when the child reaches the age at which they can consent for themselves (13 years old). You need therefore to review and refresh at this point. Consent forms can be deleted 1 year after they are no longer required ie once the picture has been removed from the website (BLP)	Secure disposal

Appendix 7. Extracurricular Activities

7.1 Educational Visits outside the Classroom					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
7.1.1	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Primary schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 – "Legal Framework and Employer Systems" and Section 4 – "Good Practice".	Date of visit + 14 years	SECURE DISPOSAL
7.1.2	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Secondary schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 – "Legal Framework and Employer Systems" and Section 4 – "Good Practice".	Date of visit + 10 years	SECURE DISPOSAL

7.1 Educational Visits outside the Classroom

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
7.1.3	Parental consent forms for school trips where there has been no major incident ²⁵	Yes		Conclusion of the trip	Although the consent forms could be retained for date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time
7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	

²⁵ One-off or blanket consent: The Department for Education (DfE) has prepared a one-off consent form to be signed by the parent on enrolment of their child in a school. This form is intended to cover all types of visits and activities where parental consent is required. The form is available on the DfE website for establishments to adopt and adapt, as appropriate, at www.gov.uk/government/publications/consent-for-school-trips-and-other-off-site-activities. A similar form could be used for other establishments, such as Early Years Foundation Stage (EYFS) providers and youth groups, or at the start of programmes for young people.

7.1 Educational Visits outside the Classroom					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
7.1.5	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL

7.2 Walking Bus					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
7.2.1	Walking bus registers	Yes		Date of register + 3 years. This takes into account the fact that, if there is an incident requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL [If these records are retained electronically any back-up copies should be destroyed at the same time]

Appendix 8. Central Government and Local Authority (LA)

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

8.1 Local Authority					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
8.1.1	Secondary transfer sheets (Primary)	Yes		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

8.2 Central Government					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
8.2.1	OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL
8.2.2	Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL
8.2.3	Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL



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