

Policy Number

19B

## Data Retention Policy and Schedule

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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. 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 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 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.

## Appendices - Data Retention periods

### Appendix 1 - Governance, Funding and Financial Management of the School Trust

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

1.1 Governance of the School Trust					
Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.1.1	Governance Statement	No	Companies Act 2006 (Section 355 & Section 386), Charities Act 2011, Taxes Management Act 1970 & HMRC Guidelines	Life of governance statement + 6 years. One copy may need to be retained for archive purposes	SECURE DISPOSAL

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

## 1.1 Governance of the School Trust

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.1.2	Articles of Association	No	Companies Act 2006 (Section 26 & Section 35), Companies Act 2006 (Section 1136) & Companies Regulations 2008, Charities Act 2011 & Academy Trust Handbook	Life of the School	SECURE DISPOSAL
1.1.3	Memorandum of Association	No	Companies Act 2006 (Section 7 & Section 8), Companies Act 2006 (Section 1136) & The Companies (Company Records) Regulations 2008, Charities Act 2011	This can be disposed of once the School has been incorporated	SECURE DISPOSAL

## 1.1 Governance of the School Trust

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.1.4	Memorandum of Understanding of Shared Governance among Schools	No	<i>Companies Act 2006 section 355</i> The Limitation Act 1980 (Section 2), UK GDPR & Data Protection Act 2018 (Storage Limitation Principle), Academy Trust Handbook (ATH) & Funding Agreements	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL
1.1.5	Constitution	No	Companies Act 2006 (Sections 26 & 35) & Charities Act 2011, The Limitation Act 1980 (Section 2) & UK GDPR	Date constitution superseded + 10 years. It may be appropriate to retain one copy of each constitution for archival purposes	SECURE DISPOSAL

## 1.1 Governance of the School Trust

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.1.6	Special Resolutions to amend the Constitution	No	Companies Act 2006 (Section 355 and 26), Charities Act 2011 & Education and Skills Funding Agency (ESFA) Oversight	Date constitution superseded + 10 years. It may be appropriate to retain one copy of each constitution for archival purposes	SECURE DISPOSAL
1.1.7	Written Scheme of Delegation	No	Companies Act 2006 section 355	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL
1.1.8	Directors – Appointment	No	Companies Act 2006 (Section 162), The Limitation Act 1980 (Section 2) & UK GDPR	Life of appointment + 6 years	SECURE DISPOSAL

## 1.1 Governance of the School Trust

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.1.9	Directors – Disqualification	No	The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification Provisions) (England) Regulations 2004. Companies Act 2006, Academy Trust Handbook	Date of disqualification + 15 years	SECURE DISPOSAL
1.1.10	Directors – Termination of Office	No	The Limitation Act 1980 (Section 2), UK GDPR & Data Protection Act 2018, Companies Act 2006 (Section 167)	Date of termination + 6 years	SECURE DISPOSAL

## 1.1 Governance of the School Trust

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.1.11	Annual Report – Trustees Report	No	<i>Companies Act 2006 section 355</i> The academy trust governance guide. Academy Trust Handbook.	Date of report + 10 years	SECURE DISPOSAL
1.1.12	Annual Report and Accounts	No	<i>Companies Act 2006 section 355</i> The academy trust governance guide. Academy Trust Handbook.	Date of report + 10 years	SECURE DISPOSAL
1.1.13	Annual Return	No	<i>Companies Act 2006 section 355</i> The academy trust governance guide. Academy Trust Handbook.	Date of report + 10 years	SECURE DISPOSAL

## 1.1 Governance of the School Trust

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.1.14	Appointment of Trustees and Governors and Directors	Yes	Companies Act 2006 section 355	Life of appointment + 6 years	SECURE DISPOSAL
1.1.15	Statement of Trustees Responsibilities	No	The Limitation Act 1980 (Section 2), Companies Act 2006 (Section 386 & Section 477), UK GDPR & Data Protection Act 2018	Life of statement + 6 years	SECURE DISPOSAL
1.1.16	Appointment and removal of Members	Yes	Companies Act 2006 (Section 113 and 121). The Limitation Act 1980 (Section 2) & UK GDPR	Life of appointment/removal + 6 years	SECURE DISPOSAL
1.1.17	Strategic Review	No	Companies Act 2006 and the Charities Act 2011	Life of the review or until review superseded + 3 years. If major changes are made to the review then an archive copy of previous review should be retained	SECURE DISPOSAL

## 1.1 Governance of the School Trust

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.1.18	Strategic Plan [also known as School Development Plans]	No	The Limitation Act 1980 (Section 2), UK GDPR & Data Protection Act 2018	Life of the plan or until plan superseded + 3 years. If major changes are made to the review then an archive copy of previous review should be retained	SECURE DISPOSAL
1.1.19	Accessibility Plan	No	Equality Act 2010 (Schedule 10), The Limitation Act 1980 (Section 2), UK GDPR & Data Protection Act 2018	Life of the plan or until plan superseded + 3 years. If major changes are made to the review then an archive copy of previous review should be retained	SECURE DISPOSAL

## 1.1 Governance of the School Trust

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.1.20	All records relating to the conversion of schools to Academy status	No	Companies Act 2006 & General Contract Law, Law of Property Act 1925 & Land Registration Legislation, UK GDPR & Data Protection Act 2018	For the life of the organisation	Consult local archives before disposal

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
	Board of Directors				

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	Companies Act 2006 (Section 248 & Section 355), The Limitation Act 1980 (Section 2 & Section 15), Charity Commission & Academy Trust Handbook, UK GDPR & Data Protection Act 2018	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	Companies Act 2006 (Section 248 & Section 355), The Limitation Act 1980 (Section 2 & Section 15), Academy Trust Handbook (ATH) & Regularity Audits, UK GDPR & Data Protection Act 2018	Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.3	Board Meeting: Annual Schedule of Business	No	UK GDPR & Data Protection Act 2018, Academy Trust Handbook (ATH) & Internal Audit Oversight	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
	<b>Committees<sup>2</sup></b>				

<sup>2</sup> 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

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.5	Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals	Companies Act 2006 (Section 248), The Limitation Act 1980 (Section 2), Education Appeals, Academy Trust Handbook (ATH) & ESFA Oversight, UK GDPR & Data Protection Act 2018	Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.6	Scheme of Delegation and Terms of Reference for Committees	No	Companies Act 2006 (Section 248 & Section 355), The Limitation Act 1980 (Section 2) & Civil Litigation, Academy Trust Handbook	Until superseded or whilst relevant [Schools may wish to retain these records for reference purposes in case decisions need to be justified]	These could be offered to the archives if appropriate
	<b>General Members' Meeting</b>				

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.7	Records relating to the management of General Members' Meetings	No	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting <sup>3</sup>	OFFER TO ARCHIVES
1.2.8	Records relating to the management of the Annual General Meeting <sup>4</sup>	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 <sup>5</sup>	OFFER TO ARCHIVES
	<b>Governors</b>				

<sup>3</sup> 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.

<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 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

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.9	Instruments of Government for the life of the school	No	Companies Act 2006 (Section 21 & Section 26), Education Act 2002 & Academy Conversion Regulations, UK GDPR & Data Protection Act 2018	For the life of the school	Consult local archives before disposing
1.2.10	<b>Agendas for Governing Body meetings</b>	May be data protection issues, if the meeting is dealing with confidential issues relating to staff	Companies Act 2006 (Section 248 & Section 355), The Limitation Act 1980 (Section 2), UK GDPR & Data Protection Act 2018	One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL <sup>6</sup>
1.2.11	<b>Agendas Additional Copies</b>	might be	UK GDPR & Data Protection Act 2018,	Date of meeting	STANDARD DISPOSAL

<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.

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.12	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	Companies Act 2006 (Section 248), The Limitation Act 1980 (Section 2 & Section 15), UK GDPR & Data Protection Act 2018		SECURE DISPOSAL
1.2.13	Principal Set (signed)	Yes	Companies Act 2006, Limitation Act 1980	Date of meeting + 10 years	
	Inspection Copies <sup>7</sup>	Yes	Academy Trust Handbook and the Companies Act 2006	Date of meeting + 10 years	

<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.

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.14	Reports presented to the Governing Body	May be data protection issues, if the report deals with confidential issues relating to staff	Companies Act 2006, the Academy Trust Handbook, and the Limitation Act 1980	Date of meeting the report was presented to + 10 years	SECURE DISPOSAL or retain with the signed set of minutes
1.2.15	Policy documents created and administered by the Governing Body	No	Academy Trust Handbook and DfE Statutory Guidance, Limitation Act 1980	All policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the government and ICO have published guidance about the implementation of the recommendations made in the IICSA report	SECURE DISPOSAL

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.16	Records relating to the appointment of co-opted governors	Yes	Academy Trust Handbook and the Companies Act 2006, Limitation Act 1980	Provided that the decision has been recorded in the minutes the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office except where there have been allegations concerning children. In this case retain for 25 years.	SECURE DISPOSAL
1.2.17	Records relating to the terms of office of serving governors including evidence of appointment	Yes	Companies Act 2006, Limitation Act 1980	Date appointment ceases plus 6 years except where there have been allegations concerning children. In this case retain for 25 years.	SECURE DISPOSAL

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.18	Records relating to Governor Declaration against disqualification criteria	No	The Limitation Act 1980 (Section 2), UK GDPR & Data Protection Act 2018 (Storage Limitation Principle), Academy Trust Handbook (ATH) & Companies Act 2006	This is expected to be a dynamic document, one copy of each version should be kept for the life of the organisation	SECURE DISPOSAL
1.2.19	Governor Code of Conduct	No	Companies Act 2006 and Charities Act 2011	This is expected to be a dynamic document, one copy of each version should be kept for the life of the organisation	SECURE DISPOSAL
1.2.20	Records relating to DBS checks carried out on clerk and members of the governing body	Yes	Keeping Children Safe in Education.	Keep copies 6 months from date of recruitment  Date the DBS Certificate was seen should be on the SCR until a new certificate is produced.	SECURE DISPOSAL

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.21	Governor personnel files	Yes	UK GDPR & Data Protection Act 2018, The Limitation Act 1980 (Section 2)	Date appointment ceases plus 6 years except where there have been allegations concerning children. In this case retain for 25 years	SECURE DISPOSAL
1.2.22	Records relating to the induction programme for new governors	Yes	UK GDPR & Data Protection Act 2018, The Limitation Act 1980 (Section 2)	Date appointment ceases plus 6 years. This should be held in the personnel file	SECURE DISPOSAL
1.2.23	Records relating to the training required and received by Governors	Yes	Limitation Act 1980 and UK GDPR.	Date Governor steps down + 6 years. This should be held in the personnel file	SECURE DISPOSAL
1.2.24	Meetings Schedule	No	UK GDPR & Data Protection Act 2018, Companies Act 2006 (Section 248), The Limitation Act 1980	Current year	SECURE DISPOSAL
1.2.25	Reports made to the Governors Meeting which are referred to in the minutes	Potential	Companies Act 2006	generally kept for the life of the organisation.	Consult local archives before disposal

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.26	Register of attendance at Full Governing Board meetings	Yes	The Limitation Act 1980 (Section 2), Companies Act 2006 (Section 248), UK GDPR / Data Protection Act 2018	Date of meeting + 6 years	SECURE DISPOSAL
1.2.27	Meeting papers relating to the annual parents' meeting	Yes	The Limitation Act 1980 (Section 2), UK GDPR / Data Protection Act 2018, Education (Independent School Standards) Regulations 2014	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
1.2.28	Trusts and Endowments managed by the Governing Body	Yes	Charities Act 2011, Trustee Act 2000, Limitation Act 1980, UK GDPR / Data Protection Act 2018	Life of the Trust or Endowment + 6 years	

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.29	Records relating to complaints dealt with by the Governing Body	Yes	The Limitation Act 1980 (Section 2), UK GDPR / Data Protection Act 2018, Education (Independent School Standards) Regulations 2014	Date complaint resolved + 3 years then review. If the complaint relates to negligence or safeguarding then date the complaint resolved + 15 years. If the complaint relates to child sexual abuse then the complaint resolved + 75 years (this retention period will be reviewed once the government and the ICO have issued guidance about the implementation of the IICSA recommendations)	SECURE DISPOSAL

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.30	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	The Companies Act 2006 / Charities Act 2011 UK GDPR / Data Protection Act 2018, Freedom of Information Act 2000	Date of report + 10 years	SECURE DISPOSAL
1.2.31	Register of Directors	Yes	Companies Act 2006, UK GDPR / Data Protection Act 2018	Date director resigns + 10 years	SECURE DISPOSAL
1.2.32	Register of Directors' interests	Yes	The Academy Trust Handbook Companies Act 2006 (Section 17, The Limitation Act 1980 (Section 2) & Section 182), UK GDPR / Data Protection Act 2018	Life of the School + 6 years	SECURE DISPOSAL

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.33	Register of members	Yes	Companies Act 2006, UK GDPR / Data Protection Act 2018	Date Member resigns + 10 years	SECURE DISPOSAL
1.2.34	Register of Trustees interests	Yes	Companies Act 2006, The Academy Trust Handbook, The Limitation Act 1980 (Section 2), UK GDPR / Data Protection Act 2018	Date Trustee resigns + 10 years	SECURE DISPOSAL
1.2.35	Declaration of Interests Statements	Yes	The Limitation Act 1980 (Section 2), Academy Trust Handbook, UK GDPR / Data Protection Act 2018	Date Governor resigns + 10 years	SECURE DISPOSAL
1.2.36	Transcripts or video recordings	Yes	UK GDPR / Data Protection Act 2018	Until the meeting minutes are approved	Secure deletion

## 1.2 Board of Directors, Members Meetings and Governing Body

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.2.37	Records relating to Governor Monitoring Visits	Yes	UK GDPR / Data Protection Act 2018, Ofsted Inspection Framework & Education (Independent School Standards) Regulations 2014, The Companies Act 2006 (Section 248)	Date of visit + 3 years	SECURE DISPOSAL

1.3 Funding and Finance					
Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
	<b>Strategic Finance</b>				
1.3.1	Statement of financial activities for the year	No	Companies Act 2006, Charities Act 2011, The Academy Trust Handbook, Limitation Act 1980	Current financial year + 6 years	SECURE DISPOSAL
1.3.2	Financial planning	No	Companies Act 2006, Charities Act 2011, The Academy Trust Handbook, Limitation Act 1980	Current financial year + 6 years	SECURE DISPOSAL
1.3.3	Value for money statement	No	Companies Act 2006, Charities Act 2011, The Academy Trust Handbook, Limitation Act 1980	Current financial year + 6 years	SECURE DISPOSAL
1.3.4	Records relating to the management of VAT	No	Companies Act 2006, Charities Act 2011, The Academy Trust Handbook, Limitation Act 1980	Current financial year + 6 years	SECURE DISPOSAL

1.3 Funding and Finance					
Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.5	Whole of government accounts returns	No	Companies Act 2006, Charities Act 2011, The Academy Trust Handbook, Limitation Act 1980	Current financial year + 6 years	SECURE DISPOSAL
1.3.6	Borrowing powers	No	Companies Act 2006, Charities Act 2011, The Academy Trust Handbook, Limitation Act 1980	Until superseded + 6 years	SECURE DISPOSAL
1.3.7	Charging and remissions policy	No	Education Act 1996, UK GDPR / Data Protection Act 2018, Limitation Act 1980	Date policy superseded + 3 years	SECURE DISPOSAL
	<b>Audit Arrangements</b>				
1.3.8	Audit Committee and appointment of responsible officers	No	Explanatory note	As long as necessary	SECURE DISPOSAL

### 1.3 Funding and Finance

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.9	Independent Auditor's report on regularity	No	The Academies Accounts Direction & ESFA Funding Agreement, Companies Act 2006, Charities Act 2011, Limitation Act 1980	Financial year report relates to + 6 years	SECURE DISPOSAL
1.3.10	Independent Auditor's report on financial statements	No	Companies Act 2006, Charities Act 2011, The Academies Accounts Direction & ESFA Funding Agreement, Limitation Act 1980, UK GDPR / Data Protection Act 2018	Financial year report relates to + 6 years	SECURE DISPOSAL
	<b>Funding Agreements</b>				

1.3 Funding and Finance					
Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.11	Funding Agreement with Secretary of State and supplemental funding agreements <sup>8</sup>	No	Ordinary Contract Law & The Limitation Act 1980	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.12	Funding Agreement – Termination of the funding agreement <sup>9</sup>	No	Companies Act 2006, The Limitation Act 1980	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.13	Funding Records – Capital Grant	No	The Limitation Act 1980	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.14	Funding Records – Earmarked Annual Grant ( <u>EAG</u> )	No	The Academy Trust Handbook, The Limitation Act 1980	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.15	Funding Records – General Annual Grant ( <u>GAG</u> )	No	Companies Act 2006, The Limitation Act 1980	Date of last payment of funding + 6 years	SECURE DISPOSAL

<sup>8</sup> Where there is multi-School governance.

<sup>9</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 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.

1.3 Funding and Finance					
Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.16	Per pupil funding records	No	Taxes Management Act 1970 & HMRC Guidelines, The Limitation Act 1980	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.17	Exclusions agreement <sup>10</sup>	No	Limitation Act 1980, UK GDPR Framework	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.18	Funding records <sup>11</sup>	No	Companies Act 2006 (Section 386), The Limitation Act 1980, Taxes Management Act 1970	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.19	Gift Aid and Tax Relief	No	Income Tax Act 2007 (Part 8) & Taxes Management Act 1970, Finance Act 2008 (Schedule 37)	Date of last payment of funding + 6 years	SECURE DISPOSAL

<sup>10</sup> 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.

<sup>11</sup> 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

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.20	Records relating to loans	No	The Limitation Act 1980, The Academy Trust Handbook, Companies Act 2006 (Section 386)	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
	<b>Payroll and Pensions</b>				
1.3.21	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years from tax year in which maternity period ends	SECURE DISPOSAL
1.3.22	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 Funding and Finance

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.23	Management of the Teachers' Pension Scheme	Yes	Teachers' Pensions Administration Guidance, Limitation Act 1980 (Section 5), Taxes Management Act 1970 & Registered Pension Schemes Regulations	Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.24	Records relating to pension registrations	Yes	Limitation Act 1980 (Section 5), Taxes Management Act 1970 & Registered Pension Schemes Regulations	Date of last payment on the pension + 6 years	SECURE DISPOSAL

### 1.3 Funding and Finance

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.25	Payroll records and reports	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988 (for reports)  <u>HMRC Guidance</u>	Date payroll run + 3 years	SECURE DISPOSAL
1.3.26	Payroll awards	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL
1.3.27	Payroll gross / net weekly or monthly	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL
1.3.28	Payslips copies	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL
1.3.29	Pay packet receipt by employee	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL

### 1.3 Funding and Finance

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.30	Part time fee claims	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL
1.3.31	Overtime	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL
1.3.32	National Insurance Schedule of payments	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL
1.3.33	Car allowance claims	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL
1.3.34	Car mileage output	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL
1.3.35	Car loans	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL
1.3.36	Staff bonus sheets	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL

### 1.3 Funding and Finance

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.37	Staff returns	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL
1.3.38	Sickness records	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL
1.3.39	Tax forms P6 /P11 / P11D / P35 / P45/ P46 / P48	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL
1.3.40	Personal bank details	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL

### 1.3 Funding and Finance

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.41	Income tax form P60	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years. Employees should keep your records for at least 22 months from the end of the tax year they relate to. The tax year runs from 6 April to the following 5 April, so keep paperwork until at least 31 January nearly two years later. For example, you should keep records relating to the tax year 2022/23 (which ends 5 April 2023) until 31 January 2025 or longer if you are self-employed.	SECURE DISPOSAL
1.3.42	Pension payroll	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL
1.3.43	Superannuation adjustments	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL

### 1.3 Funding and Finance

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.44	Superannuation reports	Yes	Taxes Management Act 1970, The Limitation Act 1980	Completion of loan + 6 years	SECURE DISPOSAL
1.3.45	Members allowance register	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL
	<b>Risk Management and Insurance</b>				
1.3.46	Insurance policies	No	Explanatory note	Date the policy expires + 6 years	SECURE DISPOSAL
1.3.47	Records relating to the settlement of insurance claims	Yes	The Limitation Act 1980	Date claim settled + 6 years	SECURE DISPOSAL
1.3.48	Employer's Liability Insurance Certificate	No	Explanatory note	Closure of the school + 40 years Pass to the Local Authority if the school closes	SECURE DISPOSAL
1.3.49	Teacher and staff Insurance	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL
	<b>Endowment Funds and Investments</b>				

1.3 Funding and Finance					
Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.50	Investment policies	No	The Academy Trust Handbook, Companies Act 2006, Charities Act 2011	Life of the investment + 6 years	SECURE DISPOSAL
1.3.51	Management of Endowment Funds	No	Charities Act 2011, The Limitation Act 1980	Life of the fund + 6 years	SECURE DISPOSAL
	<b>Accounts and Statements</b>				
1.3.52	Annual accounts	No	Companies Act 2006, Taxes Management Act 1970	Current year + 6 years	SECURE DISPOSAL
1.3.53	Student Grant applications	Yes	Taxes Management Act 1970 & The Limitation Act 1980	Current year + 3 years	SECURE DISPOSAL

### 1.3 Funding and Finance

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.54	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No	Companies Act 2006, The Limitation Act 1980	Life of the budget + 6 years	SECURE DISPOSAL
1.3.55	Invoices, receipts, order books and requisitions, delivery notices	No	Companies Act 2006, The Limitation Act 1980	Current financial year + 6 years	SECURE DISPOSAL
1.3.56	Records relating to the collection and banking of monies	No	Companies Act 2006, The Limitation Act 1980	Current financial year + 6 years	SECURE DISPOSAL
1.3.57	Records relating to the identification and collection of debt	No	Companies Act 2006, The Limitation Act 1980	Payment or write off of debt + 6 years	SECURE DISPOSAL
1.3.58	Debtor's Record (not sure if same as 1.3.38)	Yes	Section 2 of the Limitation Act 1980.	6 years from the end of the financial year.	SECURE DISPOSAL
	<b>Contract Management</b>				

### 1.3 Funding and Finance

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.59	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
1.3.60	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
1.3.61	Records relating to the monitoring of contracts	No	Limitation Act 1980	End of the contract or until the final payment has been made whichever is the longer	SECURE DISPOSAL
	<b>Asset Management</b>				
1.3.62	Inventories of furniture and equipment	No	Companies Act 2006	Life of equipment + 6 years. Equipment will have write-down value over several years - the time depending on the type of equipment	SECURE DISPOSAL

### 1.3 Funding and Finance

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.63	Burglary, theft and vandalism report forms	No	Companies Act 2006, The Limitation Act 1980	Date of insurance settlement + 6 years	SECURE DISPOSAL
1.3.64	Records relating to the leasing of shared facilities, such as sports centres	No	The Limitation Act 1980	End of lease + 6 years	SECURE DISPOSAL
1.3.65	Land and building valuations	No	Companies Act 2006, The Limitation Act 1980	Date valuation superseded + 6 years	SECURE DISPOSAL
1.3.66	Disposal of assets	No	Companies Act 2006, The Limitation Act 1980	Date asset disposed of + 6 years	SECURE DISPOSAL
1.3.67	Community School leases for land	No	Companies Act 2006, The Limitation Act 1980	Date lease expires + 6 years	SECURE DISPOSAL
1.3.68	Commercial transfer arrangements	No	The Limitation Act 1980	Date of transfer + 6 years	SECURE DISPOSAL

### 1.3 Funding and Finance

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.69	Transfer of land to the School Trust	No	Land Registration Act 2002 & The Law of Property Act 1925, The Limitation Act 1980	Life of land ownership then transfer to new owner	SECURE DISPOSAL
1.3.70	Transfers of freehold land	No	Land Registration Act 2002 & The Law of Property Act 1925, The Limitation Act 1980	Life of land ownership then transfer to new owner	SECURE DISPOSAL
	<b>School Fund</b>				
1.3.71	School Fund – Cheque books	No	Taxes Management Act 1970 / Companies Act 2006	Current year + 1 year	SECURE DISPOSAL
1.3.72	School Fund – Paying in books	No	Taxes Management Act 1970 / Companies Act 2006	Current year + 6 years	SECURE DISPOSAL

### 1.3 Funding and Finance

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.3.73	School Fund – Ledger	No	Taxes Management Act 1970 / Companies Act 2006	Current year + 6 years	SECURE DISPOSAL
1.3.74	School Fund – Invoices	No	Taxes Management Act 1970 / Companies Act 2006	Current year + 6 years	SECURE DISPOSAL
1.3.75	School Fund – Receipts	No	Taxes Management Act 1970 / Companies Act 2006	Current year + 6 years	SECURE DISPOSAL
1.3.76	School Fund – Bank statements	No	Taxes Management Act 1970 / Companies Act 2006	Current year + 6 years	SECURE DISPOSAL
1.3.77	School Fund – Journey books	No	Taxes Management Act 1970 / Companies Act 2006	Current year + 6 years	SECURE DISPOSAL

1.3 Funding and Finance					
Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
	<b>School Meals<sup>12</sup></b>				
1.3.78	Free school meals registers	Yes	Taxes Management Act 1970, UK GDPR / Data Protection Act 2018	Current year + 3 years	SECURE DISPOSAL
1.3.79	School meals registers	Yes	UK GDPR / Data Protection Act 2018	Current year + 3 years	SECURE DISPOSAL
1.3.80	School meals summary sheets	No	Companies Act 2006, Taxes Management Act 1970	Current year + 6 years	SECURE DISPOSAL
1.3.81	Pupil Premium Fund records	Yes	Taxes Management Act 1970	Date pupil leaves the provision + 6 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.

<sup>12</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.

## 1.4 Policies, Frameworks and Overarching Requirements

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.4.1	Data Protection Policy	No	Limitation Act 1980	Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	SECURE DISPOSAL
1.4.2	Freedom of Information Policy	No	Limitation Act 1980	Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	SECURE DISPOSAL
1.4.3	Information Security Breach Policy	No	Limitation Act 1980	Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	SECURE DISPOSAL

## 1.4 Policies, Frameworks and Overarching Requirements

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.4.4	Special Educational Needs Policy	No	Limitation Act 1980	Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	SECURE DISPOSAL
1.4.5	Complaints Policy	No	Limitation Act 1980	Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	SECURE DISPOSAL
1.4.6	Risk and Control Framework	No	Limitation Act 1980	Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	SECURE DISPOSAL

## 1.4 Policies, Frameworks and Overarching Requirements

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
1.4.7	Rules and Bylaws	No	Limitation Act 1980	Life of rules or bylaws or rules or bylaws superseded + 3 years. If major changes are made to the rules or bylaws then an archive copy of previous policies should be retained	SECURE DISPOSAL
1.4.8	Equality Information and Objectives (public sector equality duty) Statement for publication	No	Limitation Act 1980	Life of statement or date statement superseded + 3 years	SECURE DISPOSAL

## Appendix 2 - Human Resources

2.1 Recruitment <sup>13</sup>					
Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [operational]	Disposal
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes	Limitation Act 1980, UK GDPR / Data Protection Act 2018	Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes	Equality Act 2010, UK GDPR / Data Protection Act 2018	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	Limitation Act 1980, UK GDPR / Data Protection Act 2018	All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL

<sup>13</sup> Academies do not necessarily have to employ people with qualified teacher status; only the SEN and designated LAC teacher must be qualified.

## 2.1 Recruitment<sup>13</sup>

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [operational]	Disposal
2.1.4	Pre-employment vetting information – DBS Checks <sup>14</sup>	Yes	DBS Update Service Employer Guide June 2014  Keeping Children Safe in Education.	6 months from the date of recruitment	SECURE DISPOSAL
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes	UK GDPR / Data Protection Act 2018	Where possible, these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File	SECURE DISPOSAL
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom <sup>15</sup>	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

<sup>14</sup> Academies are bound by the legislation that applies to independent schools NOT maintained schools.

<sup>15</sup> Employers are required to take a “clear copy” of the documents which they are shown as part of this process.

<b>2.1 Recruitment<sup>13</sup></b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Personal information</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>	<b>Disposal</b>
2.1.7	Records relating to the employment of overseas teachers	Yes	Home Office 'An Employer's Guide to Right to Work Checks', Immigration, Asylum and Nationality Act 2006	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	Limitation Act 1980 (Section 5), UK GDPR / Data Protection Act 2018	Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL
<b>2.2 Operational Staff Management</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Personal information</b>	<b>Statutory Provisions</b>	<b>Retention Period [Operational]</b>	<b>Disposal</b>
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

## 2.1 Recruitment<sup>13</sup>

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [operational]	Disposal
2.2.2	Timesheets	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL
2.2.3	Annual appraisal/assessment records	Yes	Limitation Act 1980, UK GDPR / Data Protection Act 2018	Current year + 3 years	SECURE DISPOSAL
2.2.4	Records relating to the agreement of pay and conditions	No	Limitation Act 1980 (Section 5), Employment Rights Act 1996	Date pay and conditions superseded + 6 years	SECURE DISPOSAL
2.2.5	Training needs analysis	No	UK GDPR, Limitation Act 1980	Current year + 1 year	SECURE DISPOSAL
2.2.6	Annual leave records	Yes	Employment Rights Act 2025:	6 years	SECURE DISPOSAL

## 2.1 Recruitment<sup>13</sup>

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [operational]	Disposal
2.2.7	Absence Record (of staff and teachers)	Yes	Limitation Act 1980, UK GDPR / Data Protection Act 2018	Current year + 3 years	SECURE DISPOSAL
2.2.8	Sickness absence monitoring	Yes	Limitation Act 1980, UK GDPR / Data Protection Act 2018	Sickness records are categorised as sensitive data. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records' (2003) It could be argued that where sickness pay is not paid then current year + 3 years is acceptable whilst if sickness pay is made then it becomes a financial record and current year + 6 years applies. The actual retention may depend on the internal auditors. Most seem to accept current year+ 3 years as being acceptable as this gives them, 'Benefits' and Inland Revenue time to investigate if they need to.	

## 2.1 Recruitment<sup>13</sup>

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [operational]	Disposal
2.2.9	Staff Training where the training leads to Continuing Professional Development	Yes	Limitation Act 1980, UK GDPR / Data Protection Act 2018	Length of time required by the professional body	SECURE DISPOSAL
2.2.10	Staff Training except where dealing with children, e.g. First Aid or Health and Safety	Yes	Limitation Act 1980, UK GDPR / Data Protection Act 2018	This should be retained on the personnel file	SECURE DISPOSAL
2.2.11	Staff Training where the training relates to children (e.g. safeguarding or other child related training)	Yes	Limitation Act 1980, UK GDPR / Data Protection Act 2018	Date of training + 40 years	SECURE DISPOSAL

## 2.1 Recruitment<sup>13</sup>

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [operational]	Disposal
2.2.12	Tachograph: Analogue and electronic including driver's cards		<p>Transport Act 1968 Chapter 73 Sections 96, 98, 99, 103.</p> <p>Passenger and Goods Vehicles (Recording Equipment) Regulations 2005 SI 2005 No 1904.</p> <p>Passenger and goods Vehicles (Recording Equipment) (downloading and Retention of Data) Regulations 2008 SI 2008 No 198.</p> <p>EC Regulation 561/2006 EC or AETR rules may also apply includes digital recording equipment</p>	Current year + 12 months	SECURE DISPOSAL

## 2.1 Recruitment<sup>13</sup>

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [operational]	Disposal
2.2.13	Drivers records book	Yes	Transport Act 1968 Chapter 73 Sections 96, 98, 99, 103. Drivers' Hours (Goods Vehicles) (Keeping of Records) Regulations 1987. SI 1987 No.1421. Regulation 11 Preservation of	12 months from date of return of book to employer or in the case of owner driver 12 months from date of completion of book or it ceased to be used Driver to retain book for 14 days after all weekly record sheets have been used.	SECURE DISPOSAL
2.2.14	Health surveillance records of staff	Yes	The Control of Substances Hazardous to Health Regulations 2002	40 Years	SECURE DISPOSAL
2.2.15	Any other health records of staff	Yes	The Control of Substances Hazardous to Health Regulations 2002	While in employment	SECURE DISPOSAL

## 2.3 Management of Disciplinary and Grievance Processes

Ref	Basic file description	Personal Information	Statutory provisions	Retention Period [operational]	Disposal
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded <sup>16</sup>	Yes x	“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”  Keeping children safe in education Statutory guidance	Until the person’s normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	SECURE DISPOSAL
2.3.2	Disciplinary Proceedings	Yes	Limitation Act 1980, UK GDPR / Data Protection Act 2018		
2.3.3	<ul style="list-style-type: none"> <li>Oral warning</li> </ul>		Limitation Act 1980, UK GDPR / Data Protection Act 2018	Date of warning <sup>17</sup> + 6 months	SECURE DISPOSAL <sup>18</sup>
2.3.4	<ul style="list-style-type: none"> <li>Written warning – level 1</li> </ul>		Limitation Act 1980, UK GDPR / Data Protection Act 2018	Date of warning + 12 months	SECURE DISPOSAL <sup>19</sup>

<sup>16</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>17</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>18</sup> If warnings are placed on personal files, then they must be weeded from the file.

<sup>19</sup> If warnings are placed on personal files, then they must be weeded from the file.

## 2.3 Management of Disciplinary and Grievance Processes

Ref	Basic file description	Personal Information	Statutory provisions	Retention Period [operational]	Disposal
2.3.5	<ul style="list-style-type: none"> <li>Written warning – level 2</li> </ul>		Limitation Act 1980, UK GDPR / Data Protection Act 2018	Date of warning + 12 months	SECURE DISPOSAL <sup>20</sup>
2.3.6	<ul style="list-style-type: none"> <li>Final warning</li> </ul>		Limitation Act 1980, UK GDPR / Data Protection Act 2018	Date of warning + 15 months	SECURE DISPOSAL <sup>21</sup>
2.3.7	<ul style="list-style-type: none"> <li>Case not found</li> </ul>		Limitation Act 1980, UK GDPR / Data Protection Act 2018	If the incident is child protection related, then see IRMSTK29.1 otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL

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

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

2.4 Health and Safety					
Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
2.4.1	Health and Safety policy statements	No	Limitation Act 1980, Health and Safety at Work etc. Act 1974	Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety risk assessments	No	Limitation Act 1980, Health and Safety at Work etc. Act 1974	Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.3	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	

## 2.4 Health and Safety

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
2.4.4	<ul style="list-style-type: none"> <li>Adults</li> </ul>		Limitation Act 1980, The Social Security (Claims and Payments) Regulations 1979, UK GDPR / Data Protection Act 2018	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	SECURE DISPOSAL
2.4.5	<ul style="list-style-type: none"> <li>Children</li> </ul>		Limitation Act 1980, UK GDPR / Data Protection Act 2018	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 Do not keep completed entries in the book. They must be removed and kept in a locked location.	SECURE DISPOSAL
2.4.6	Control of Substances Hazardous to Health (COSHH)	No	The Control of Substances Hazardous to Health Regulations 2002.	5 years	SECURE DISPOSAL

## 2.4 Health and Safety

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	Yes	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
2.4.8	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation: Dose assessment and recording	No	The Ionising Radiations Regulation 2017	2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. To keep the records made and maintained or a copy of these records until the person to whom the record relates has or would have attained the age of 75 years but in any event for at least 30 years from when the record was made	SECURE DISPOSAL
2.4.9	Fire precautions log books	No	The Regulatory Reform (Fire Safety) Order 2005.Limitation Act 1980	Current year + 6 years	SECURE DISPOSAL

## 2.4 Health and Safety

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
2.4.10	Fire risk assessments	No, unless containing Personal Emergency Evacuation plans	The Regulatory Reform (Fire Safety) Order 2005.	Life of the risk assessment + 6 years  Retain as detailed in section 2 of the Limitation Act 1980.	SECURE DISPOSAL
2.4.11	Records relating to accident/injury at work including Incident reports	Yes	Limitation Act 1980, Social Security (Claims and Payments) Regulations 1979, UK GDPR / Data Protection Act 2018	Date of incident plus 6 years unless the injury is serious - broken limb, more than 3 days in hospital etc then date of incident plus 15 years (Negligence)	SECURE DISPOSAL
2.4.12	Risk assessments and written schemes for legionella and the water temperature testing sheets	Yes	ACOP L8	retained throughout the period they remain current and for at least two years after that period. Monitoring, inspection, and test results must be retained for at least five years.	Secure disposal

## 2.4 Health and Safety

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
2.4.13	Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR)	Yes	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2)	Date of incident + 3 years provided that all records relating to the incident are held on personnel file. See IRMSTK17.5 and IRMSTK17.7	SECURE DISPOSAL

### Appendix 3 - Management of the School

3.1 Admissions					
Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
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 + 7 years. 15(2) of the regulation refers to the 7 preceding years	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 + 6 years	SECURE DISPOSAL

<b>3.1 Admissions</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Personal Information</b>	<b>Statutory Provisions</b>	<b>Retention Period [Operational]</b>	<b>Disposal</b>
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 <sup>22</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
3.1.5	Admissions – Secondary Schools – Casual	Yes	School Admissions Code (DfE Statutory Guidance)	Current year + 1 year	SECURE DISPOSAL

<sup>22</sup> School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014 p6.

<b>3.1 Admissions</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Personal Information</b>	<b>Statutory Provisions</b>	<b>Retention Period [Operational]</b>	<b>Disposal</b>
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			
3.1.8	<ul style="list-style-type: none"> <li>For successful admissions</li> </ul>		The Education (Pupil Information) (England) Regulations 2005	This information should be added to the pupil file	As per pupil file
3.1.9	<ul style="list-style-type: none"> <li>For unsuccessful admissions</li> </ul>		DfE School Admissions Code	Until appeals process completed	SECURE DISPOSAL

3.1 Admissions					
Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
3.1.20	Birth certificates evidencing age	Yes	Admissions code 2021. paragraph 2.5, page 22 of the School Admissions Code: <a href="https://www.gov.uk/government/publications/school-admissions-code--2">https://www.gov.uk/government/publications/school-admissions-code--2</a> )	End of Y1(new starters) End of Y6 (in year admissions). Kept for the DFE for auditing purposes	SECURE DISPOSAL

3.2 Head Teacher and Senior Management Team					
Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
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	Public Records Act 1958 & Freedom of Information Act 2000 (Section 46)	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

<b>3.2 Head Teacher and Senior Management Team</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Personal information</b>	<b>Statutory Provisions</b>	<b>Retention Period [Operational]</b>	<b>Disposal</b>
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	Limitation Act 1980	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	UK GDPR, Ofsted Audit Framework	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	UK GDPR / Data Protection Act 2018	Current academic year + 3 years then REVIEW	SECURE DISPOSAL
3.2.5	Correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff	UK GDPR / Data Protection Act 2018	Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL

### 3.2 Head Teacher and Senior Management Team

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
3.2.6	Professional Development Plans	Yes	The Education (School Teachers' Appraisal) (England) Regulations 2012 (Regulation 14), Limitation Act 1980	Life of the plan or plan superseded + 6 years	SECURE DISPOSAL

### 3.3 Operational Administration

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
3.3.1	Management of complaints	Yes	Limitation Act 1980, UK GDPR / Data Protection Act 2018	Date complaint resolved + 3 years. If the complaint relates to negligence or safeguarding then date the complaint resolved + 15 years. If the complaint relates to child sexual abuse then the complaint resolved + 75 years (this retention period will be reviewed once the government and the ICO have issued guidance about the implementation of the IICSA recommendations)	SECURE DISPOSAL
3.3.2	Records relating to the management of contracts with external providers	No	Limitation Act 1980	Date of last payment on contract + 6 years	SECURE DISPOSAL
3.3.3	Records relating to the management of software licences	No	Limitation Act 1980	Date licence expires + 6 years	SECURE DISPOSAL

3.3 Operational Administration					
Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
3.3.4	Records relating to the creation and publication of the school brochure or prospectus	No	UK GDPR / Data Protection Act 2018	Current year + 3 years. Schools should consider archiving one copy for historical reasons	STANDARD DISPOSAL
3.3.5	Records relating to the creation and distribution of circulars to staff, parents or pupils	No	UK GDPR / Data Protection Act 2018	Current year + 1 year	STANDARD DISPOSAL
3.3.6	Newsletters and other items with a short operational use	No	UK GDPR / Data Protection Act 2018	Current year + 1 year	SECURE DISPOSAL - Schools should decide whether items published on the school website are retained as an archive or whether they should be deleted at the same time as the master copy
3.3.7	Visitor Management Systems (including electronic systems, Visitors' books and signing in sheets)	Yes	Limitation Act 1980	Academic Year + 1 year [Schools may decide to archive one copy] Staff sign in sheets destroyed after 6 months	SECURE DISPOSAL

3.3 Operational Administration					
Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
3.3.8	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	Yes	UK GDPR / Data Protection Act 2018	Current year + 6 years then REVIEW	SECURE DISPOSAL
3.3.9	School Privacy Notice which is sent to parents as part of GDPR compliance	No	UK GDPR / Data Protection Act 2018	Life of the privacy notice/until the privacy notice plus 6 years	SECURE DISPOSAL
3.3.10	Consents relating to school activities as part of GDPR compliance (for example, consent to be sent circulars or mailings)	Yes	UK GDPR / Data Protection Act 2018	Consents should be retained for as long as the consent is relied on.	SECURE DISPOSAL

## Appendix 4 - Property Management

This section covers the management of buildings and property.

4.1 Property Management					
Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
4.1.1	Title deeds of properties belonging to the school	No	Section 2 of the Limitation Act 1980.	12 years from the end of the deed  These should follow the property, unless the property has been registered with the Land Registry	Transfer to new owner or SECURE DISPOSAL

## 4.1 Property Management

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
4.1.2	Plans of property belonging to the school including any alterations. This is also a health and safety requirement and includes rewiring diagrams and additional fire safety features	No	Public Records Act 1958, Construction (Design and Management) Regulations 2015, Health and Safety at Work Act 1974, Electricity at Work Regulations 1989, Regulatory Reform (Fire Safety) Order 2005	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	Pass to next owner
4.1.3	Leases of property leased by or to the school	No	Limitation Act 1980	Expiry of lease + 6 years	SECURE DISPOSAL

## 4.1 Property Management

Ref	Basic file description	Personal Information	Statutory Provisions	Retention Period [Operational]	Disposal
4.1.4	Records relating to the letting of school premises	No	Limitation Act 1980	Current financial year + 6 years	SECURE DISPOSAL
4.1.5	Business continuity and disaster recovery plans	Yes	Civil Contingencies Act 2004,	These are dynamic documents which should be kept up to date	SECURE DISPOSAL OF OLD PLANS

## 4.2 Maintenance

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
4.2.1	All records relating to the maintenance of the school carried out by contractors	No	Record keeping (VAT Notice 700/21).	6 years from end of the financial year. This may vary on the type of maintenance. Records relating to rewiring, major alterations etc must be retained in the health and safety file whilst the building belongs to the school and must be passed onto any new owners if the building is leased or sold.	SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the school carried out by school employees, including maintenance log books	No	Record keeping (VAT Notice 700/21).	Life of equipment + 6 years. Alterations to wiring and major modifications must be entered in to the health and safety file	SECURE DISPOSAL

### 4.3 Fleet Management

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	No	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE 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	No	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.3	Service logs and vehicle logs	No	Limitation Act 1980 (Section 2)	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	SECURE DISPOSAL
4.3.4	GPS tracking data relating to the vehicles	No	Limitation Act 1980 (Section 2)	Current year + 12 months	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					
Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
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"> <li>Primary</li> </ul>		The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	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"> <li>To another primary school</li> <li>To a secondary school</li> <li>To a pupil referral unit</li> </ul> <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</p>

## 5.1 Pupil's Educational Record

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
					returned to the LA to be retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the LA, as it is more likely that the pupil will request the record from the LA
5.1.2	Records relating to the management of exclusions	Yes	The Education (Pupil Information) (England) Regulations 2005, DFE Statutory Guidance	Date of birth of the pupil involved + 25 years	SECURE DISPOSAL
5.1.3	Management of examination registrations	Yes	JCQ General Regulations for Approved Centres	The examination board will usually mandate how long these records need to be retained	
5.1.4	Examination results – pupil copies	Yes	JCQ General Regulations for Approved Centres		

## 5.1 Pupil's Educational Record

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
	<ul style="list-style-type: none"> <li>Public</li> </ul>		JCQ General Regulations for Approved Centres	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>		JCQ General Regulations for Approved Centres	This information should be added to the pupil file	
<p><b>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</b></p>					

## 5.1 Pupil's Educational Record

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
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"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"</p>	<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.</p> <p>If there is any information relating to child sexual abuse, retain until the child's 75th birthday.</p>	SECURE DISPOSAL – these records MUST be shredded

## 5.1 Pupil's Educational Record

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
5.1.6	Restrictive interventions	Yes	DfE statutory guidance and the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025.	kept for a minimum of 25 years from the date of the incident. If the record involves an allegation of abuse against a staff member The records must be kept until the staff member reaches normal pension age, OR For 10 years from the date of the allegation— whichever timeframe is longer.	SECURE DISPOSAL

## 5.1 Pupil's Educational Record

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
5.1.7	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  If there is any information relating to child sexual abuse, retain until the child's 75th birthday.	SECURE DISPOSAL – these records MUST be shredded
5.1.8	Family Liaison Officers and Home School Liaison Assistants: Day Books	Yes	UK GDPR Article 5(1)(c) & (e)	Current year + 2 years then review	SECURE DISPOSAL

## 5.1 Pupil's Educational Record

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
5.1.9	Family Liaison Officers and Home School Liaison Assistants: Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes	UK GDPR, Limitation Act 1980	Whilst child is attending school and then destroy	SECURE DISPOSAL
5.1.10	Family Liaison Officers and Home School Liaison Assistants: Referral forms	Yes	UK GDPR, Limitation Act 1980	While referral is current	SECURE DISPOSAL
5.1.11	Family Liaison Officers and Home School Liaison Assistants: Contact data sheets	Yes	UK GDPR, Limitation Act 1980	Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL

## 5.1 Pupil's Educational Record

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
5.1.12	Family Liaison Officers and Home School Liaison Assistants: Contact database entries	Yes	UK GDPR, Limitation Act 1980	Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL
5.1.13	Family Liaison Officers and Home School Liaison Assistants: Group Registers	Yes	UK GDPR, Limitation Act 1980	Current year + 2 years	SECURE DISPOSAL

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

## 5.2 Attendance

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
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 6 years after the date on which the entry was made	SECURE DISPOSAL
5.2.2	Correspondence relating to any absence (authorised or unauthorised)	Yes	Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL

## 5.3 Special Educational Needs

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Data Protection Act 2018 (GDPR) and the Limitation Act 1980	Date of birth of the pupil + 25 years	SECURE DISPOSAL

### 5.3 Special Educational Needs

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
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] unless the document is subject to a legal hold then 6 years after legal action ended	SECURE DISPOSAL
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] unless the document is subject to a legal hold then date legal action ceases + 6 years	SECURE DISPOSAL

5.3 Special Educational Needs					
Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
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] unless the document is subject to a legal hold then date legal action ceases + 6 years	SECURE DISPOSAL
5.3.5	Accessibility Plan relating to <b>individual pupils</b>	Yes	Equality Act 2010 (Schedule 10), Limitation Act 1980	The plan should be included on the pupil file and retained until 6 years from the end of the EHC plan	SECURE DISPOSAL
5.3.6	Accessibility Plan relating to health and safety records	No	Retain as detailed in section 2 of the Limitation Act 1980.	Life of plan plus 6 years	

## Appendix 6 - Curriculum Management

## 6.1 Statistics and Management Information

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
6.1.1	Curriculum returns	No	Education Act 1996	Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination results (schools copy)	Yes	Limitation Act 1980	Current year + 6 years	SECURE DISPOSAL
6.1.3	SATs records –	Yes			
6.1.4	<ul style="list-style-type: none"> <li>Results</li> </ul>		The Education (Pupil Information) (England) Regulations 2005	<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
6.1.5	<ul style="list-style-type: none"> <li>Examination papers</li> </ul>		Standards and Testing Agency (STA) Assessment and Reporting Arrangements (ARA)	The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL

## 6.1 Statistics and Management Information

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
6.1.6	Published Admission Number (PAN) reports	Yes	School Admissions Code (issued under Section 84 of the School Standards and Framework Act 1998)	Current year + 6 years	SECURE DISPOSAL
6.1.7	Value added and contextual data	Yes	Ofsted Inspection Framework & School Accountability, Limitation Act 1980 (Section 5)	Current year + 6 years	SECURE DISPOSAL
6.1.8	Passport and visa to establish we do not publish results	Yes		1 year after KS2 exams taken	
6.1.9	Self-evaluation forms	Yes	Limitation Act 1980	Current year + 6 years	SECURE DISPOSAL

## 6.1 Statistics and Management Information

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
6.1.10	External moderation	Yes	Limitation Act 1980, Ofsted Quality of Education Framework	Until superseded	SECURE DISPOSAL
6.1.11	Internal moderation	Yes	Limitation Act 1980, Ofsted Quality of Education Framework	Academic year plus one academic year	SECURE DISPOSAL

## 6.2 Implementation of Curriculum

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
6.2.1	Schemes of work	No	IRMS Toolkit Guidelines	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	UK GDPR & Data Protection Act 2018	Academic 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	UK GDPR & Data Protection Act 2018	Academic 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	UK GDPR & Data Protection Act 2018	Academic 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

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
6.2.5	Record of homework set	No	UK GDPR & Data Protection Act 2018	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	UK GDPR & Data Protection Act 2018	Current year + 1 year	SECURE DISPOSAL

## Appendix 7 - Extracurricular Activities

7.1 Educational Visits outside the Classroom					
Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
7.1.1	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Primary schools	No	Limitation Act 1980  <u>Health and safety on educational visits DfE guidance</u>	10 years from the date of the visit.  If there was an incident on the visit, retain the permission slips for all pupils and the incident report in the pupil record, or until the pupil reaches the age of 25.	SECURE DISPOSAL

## 7.1 Educational Visits outside the Classroom

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
7.1.2	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Secondary schools	No	Limitation Act 1980  <u>Health and safety on educational visits DfE guidance</u>	10 years from the date of the visit.  If there was an incident on the visit, retain the permission slips for all pupils and the incident report in the pupil record, or until the pupil reaches the age of 25.	SECURE DISPOSAL

## 7.1 Educational Visits outside the Classroom

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
7.1.3	Parental consent forms for school trips where there has been no major incident <sup>23</sup>	Yes	UK GDPR & Data Protection Act 2018	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  SECURE DISPOSAL
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	SECURE DISPOSAL

<sup>23</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.

## 7.1 Educational Visits outside the Classroom

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
7.1.5	Records relating to residential trips	Yes	Limitation Act 1980	Date of birth of youngest pupil involved + 25 years or if there is a major incident then date of incident + 15 years whichever is the longer	SECURE DISPOSAL

## 7.2 Walking Bus

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
7.2.1	Walking bus registers	Yes	Limitation Act 1980, Management of Health and Safety at Work Regulations 1999	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					
Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
8.1.1	Secondary transfer sheets (Primary)	Yes	The Education (Pupil Information) Regulations 2005 (Reg 9), UK GDPR	Academic year + 2 years	SECURE DISPOSAL
8.1.2	Attendance returns	Yes	The School Attendance (Pupil Registration) (England) Regulations 2024 (Reg 13), Education Act 1996 (Section 444)	Academic year + 1 year	SECURE DISPOSAL
8.1.3	School census returns	No	Education Act 1996, UK GDPR	Current year + 5 years	SECURE DISPOSAL

## 8.1 Local Authority

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
8.1.4	Circulars and other information sent from the Local Authority	No	UK GDPR	Operational use	SECURE DISPOSAL

## 8.2 Central Government

Ref	Basic file description	Personal information	Statutory Provisions	Retention Period [Operational]	Disposal
8.2.1	OFSTED reports and papers	No	Education Act 2005 & Public Records Act 1958	Life of the report then REVIEW	SECURE DISPOSAL
8.2.2	Returns made to central government	No	Limitation Act 1980	Current year + 6 years	SECURE DISPOSAL
8.2.3	Circulars and other information sent from central government	No	UK GDPR	Operational use	SECURE DISPOSAL

**9 Records from IRMS not currently included in Ebor's policy**

<b>Ref</b>	<b>Basic file description</b>	<b>Personal Info'n</b>	<b>Statutory Provisions</b>	<b>Retention Period [Operational]</b>	<b>Disposal</b>