

The Cam Academy Trust Management and Record Retention	
Approved in consultation with the Audit & Risk Committee on behalf of the Trust Board:	24 th March 2022
To be reviewed:	Every 2 years or as appropriate
Date of next review:	March 2024
Responsible Officer:	C. Ducket
Category - 1	Version 2

Introduction

This policy statement provides a mandate for the management and retention of all records and information management functions. This policy applies to the retention of all records within The CAM Academy Trust on how it manages its records, including electronic records. Some of the guidance below relates to records within schools that will contain 'personal data'. Personal data is defined under the General Data Protection Regulation (GDPR) as:

- Any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (GDPR article 4).

Under data protection laws 2018 it is the Cam Academy Trust responsibility to ensure compliance with the Data Protection Act 2018 (General Data Regulation GDPR). This responsibility is delegated to each school for day to day management of this policy. Therefore, where records contain personal data the Cam Academy Trust and the schools within the Trust need to be aware of the additional obligations they need to meet.

The Data Protection Act 2018 introduces several legal obligations in relation to records containing personal data. This includes obligations such as advising data subjects of the information which is held on them, the purpose for which the data is held or process such information, how long it is held for (the retention period), the legal basis for which the personal data is processed and what the data subject's rights are in relation to the data. Personal data should be kept for no longer than

necessary. This means that the Cam Academy Trust and the schools within the Trust need to be aware of how long each type of record needs to be retained in law, where it might be judicious to retain records for a longer period and how to destroy records that are no longer needed.

Under the Freedom of Information Act 2000, schools are required to maintain a retention schedule listing the records which the school creates in the course of its business. The retention schedule lays down the length of time for which the record needs to be maintained and the action which is taken when it is of no further administrative use (what is destroyed, when it was destroyed and by whom).

This policy is based upon the recommendations by the Records Management Society for maintained schools in England and that produced by Buzzacott LLP for compliance with the Charity Commission's requirements.

The Cam Academy Trust recognises that the efficient management of its records across the Trust and all the schools within the Trust is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the organisation. This document provides the policy framework through which this effective management can be achieved and audited.

This policy applies to all records created, received or maintained by staff of the Cam Academy Trust in the course of carrying out its functions. This policy also applies to all accounting records required for retention by the Charity Commission under the Charities Act 2011 and under the Companies Act 2006 as well as those records required by HMRC and others to be retained. Records are defined as all those documents which facilitate the business carried out by the Cam Academy Trust and all schools within the Trust and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronic copy.

A small percentage of the Cam Academy Trust's records may be selected for permanent preservation by the Trust or a school within the Trust as part of archives and for historical research.

Action plan

The Cam Academy Trust and the schools within the Trust keep records under a wide variety of headings These will include:

- Child protection.
- Governance.
- Management.
- Pupils.
- Curriculum.
- Personnel records of staff.
- Health and safety.
- Administration.
- Finance.
- Property.
- CCTV.
- School meals.
- DFE, local authority (LA), work experience and careers, family liaison.

The Cam Academy Trust has a responsibility to maintain these records and record keeping systems in accordance with the regulatory environment. In practice the Trust will oversee this for central Trust records. Individual schools will oversee this for their own records.

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

The storage and retention of digital information will be handled on a day-to-day basis by the IT manager under guidance of the Head Teacher/Principal at school level and the Finance and Operations Director at Trust level ensuring that records are held securely, backed-up on suitable systems, archived when necessary and checked regularly for ease of retrieval when required. Guidance may also be required from a school's nominated data protection lead to ensure compliance.

Employees of the Cam Academy Trust must ensure that records for which they are responsible are accurate, kept securely, and are maintained and disposed of in accordance with the school's management and retention policy. Loss and destruction of records that contain personal data can carry significant penalties from the Information Commissioner's Office (ICO). It is important for all employees, Trustees and Governors of the Cam Academy Trust to be aware of this and ensure personal data is not placed at risk and that there are appropriate safeguards in place. There may be further consequences for individuals who fail to comply with the management and record retention policy.

The Trust financial and Operations Director is responsible for the secure retention of financial documents for the period required by the Companies Act and charity legislation. Each school is responsible for the secure retention of all financial documents which support the information held by the Trust Financial Operations Director. These documents may be requested by authorised external agencies at any time, for example the academy's auditors or the EFA. The Trust Finance and Operations Director decides with the Trust IT manager the secure retention of electronic accounting records.

The benefits of a management retention policy:

- Managing records against the retention schedule becomes normal processing and employees can be confident that they are managing data in an appropriate manner.
- Members of staff can be confident about shredding/erasing information at the appropriate time and with appropriate safeguards in place.
- Information which is subject to freedom of information and data protection legislation will be available when required.
- The school is not maintaining and storing information unnecessarily.

Archives

Old accounting, personnel records and some other records can be archived as memorabilia, important landmark or heritage of the Trust or school.

Archived records will:

- Be treated as being as confidential as current records.
- Not necessarily be as accessible as current records but will still be retrievable.
- Have adequate storage made available or may be kept electronically.

Points to consider when deciding on whether records will be stored electronically or in hard copy are:

- Do the records need to be kept in the original format (for legal reasons).
- Does the medium chosen to archive the records have an acceptable lifespan for records that will have to be retained for a very long time.
- Where records are archived electronically or in hard copy there must be an adequate means for accessing and printing the record.

A record of all documents that have been archived electronically or in hard copy will be kept.

Disposal of records

When the period of retention has expired and there is no other reason to keep them, the records may be disposed of safely and securely.

When disposing of records containing personal data or sensitive data the Cam Academy Trust and the schools within the Trust must ensure that the document is securely destroyed.

Ways this can be achieved:

- Use of a cross-cutting shredding machine on site
- Use of a shredding service which comes to site and shred the documents on site. (a certificate of destruction will be issued when this service is used)
- Cutting up CDs and similar items
- Dismantling and destroying hard drives. (This may be done by the IT team on site or by a specialist IT company)

. A list is kept of records which have been destroyed. This list includes:

- The file reference.
- The file title or a brief description.
- The number of files and date range.
- The name of the authorising officer.
- The date the file was destroyed.

Monitoring and evaluation

This policy has been drawn up within the context of the Freedom of information policy, the Data protection policy and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school and will be monitored to ensure that the legal retention guidelines which may change periodically are adhered to.

In addition, The Cam Academy Trust recognises the specific requirements for the retention of accounting records and other corporate records by the Charity Commission, HMRC and under the Companies Act 2006 and will therefore monitor the guidelines as recommended by the Charity Commission in the document 'Retention of accounting records and other corporate records'.

Reviewing

The Cam Academy Trustee's are responsible for the maintenance of this policy and will review it biannually in the light of any recommendations or changes made by the Information and Records Management Society and the Charity Commission.

The Cam Academy Trust Retention Schedule

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

1.1 Governance of the Academy Trust					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.1.1	Governance Statement	No		Life of governance statement + 6 years	SECURE DISPOSAL
1.1.2	Articles of Association	No		Life of the Academy	
1.1.3	Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL

1.1 Governance of the Academy Trust					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.1.4	Memorandum of Understanding of Shared Governance among Schools	No	<i>Companies Act 2006 section 355</i>	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL
1.1.5	Constitution	No		Life of the Academy	
1.1.6	Special Resolutions to amend the Constitution	No		Life of the Academy	
1.1.7	Written Scheme of Delegation	No	<i>Companies Act 2006 section 355</i>	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL
1.1.8	Directors – Appointment	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.9	Directors – Disqualification	No	Company Directors Disqualification Act 1986	Date of disqualification + 15 years	SECURE DISPOSAL
1.1.10	Directors – Termination of Office	No		Date of termination + 6 years	SECURE DISPOSAL

1.1 Governance of the Academy Trust					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.1.11	Annual Report – Trustees Report	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.12	Annual Report and Accounts	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.13	Annual Return	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.14	Appointment of Trustees and Governors and Directors	Yes		Life of appointment + 6 years	SECURE DISPOSAL
1.1.15	Statement of Trustees Responsibilities	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.16	Appointment and removal of Members	No		Life of appointment + 6 years	SECURE DISPOSAL

1.1 Governance of the Academy Trust					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.1.17	Strategic Review	No		Date of the review + 6 years	SECURE DISPOSAL
1.1.18	Strategic Plan [also known as School Development Plans]	No		Life of plan + 6 years	SECURE DISPOSAL
1.1.19	Accessibility Plan	There may be if the plan refers to specific pupils	Limitation Act 1980 (Section 2)	Life of plan + 6 years	SECURE DISPOSAL

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

1.2 Board of Directors, Members Meetings and Governing Body					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	<i>Committees</i>				
1.2.5	Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
	<i>General Members' Meeting</i>				

1.2 Board of Directors, Members Meetings and Governing Body					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting ¹	OFFER TO ARCHIVES

¹ 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.

1.2 Board of Directors, Members Meetings and Governing Body					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.7	Records relating to the management of the Annual General Meeting	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting ²	OFFER TO ARCHIVES
	Governors				

² The signed minutes must be kept securely together with the notice and agenda for the meeting and any supporting documentation provided for consideration at the meeting. Documentation is generally filed in a dedicated minute book, which is usually in the form of a loose-leaf binder to which additional pages can be easily added.

1.2 Board of Directors, Members Meetings and Governing Body					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.8	<i>Agendas for Governing Body meetings</i>	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL ³
1.2.9	<i>Minutes of, and papers considered at, meetings of the Governing Body and its committees</i>	May be data protection issues, if the meeting is dealing with confidential issues relating to staff			
	<i>Principal Set (signed)</i>			Life of Academy	

³ In this context, SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross-cut shredder.

1.2 Board of Directors, Members Meetings and Governing Body					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	<i>Inspection Copies⁴</i>			Date of meeting + 3 years	SECURE DISPOSAL
1.2.10	<i>Reports presented to the Governing Body</i>	May be data protection issues, if the report deals with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy	SECURE DISPOSAL or retain with the signed set of minutes
1.2.11	<i>Meeting papers relating to the annual parents' meeting held under Section 33 of the Education Act 2002</i>	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL

⁴ These are the copies which the clerk to the Governor may wish to retain, so that requestors can view all the relevant information, without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

1.2 Board of Directors, Members Meetings and Governing Body					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.12	<i>Trusts and Endowments managed by the Governing Body</i>	No		PERMANENT	
1.2.13	<i>Records relating to complaints dealt with by the Governing Body</i>	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL

1.2 Board of Directors, Members Meetings and Governing Body					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.14	<i>Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002</i>	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
	Statutory Registers⁵				

⁵ Academies are required by law to keep specific records, collectively known as statutory registers or the statutory books. The registers record information relating to the Academy's operations and structure, such as the current directors. Records should be kept up-to-date to reflect any changes that take place.

1.2 Board of Directors, Members Meetings and Governing Body					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.2.15	<i>Register of Directors</i>	Yes	Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.16	<i>Register of Directors' interests [this is not a statutory register]</i>	Yes		Life of the Academy + 6 years	SECURE DISPOSAL
1.2.17	<i>Register of Directors' residential addresses</i>	Yes	Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.18	<i>Register of gifts, hospitality and entertainments</i>	Yes	Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.19	<i>Register of members</i>	Yes	Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.20	<i>Register of secretaries</i>	Yes	Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.21	<i>Register of Trustees interests</i>	Yes		Life of the Academy + 6 years	SECURE DISPOSAL
1.2.22	<i>Declaration of Interests Statements [Governors] [this is not a statutory register]</i>	Yes		Life of the Academy + 6 years	SECURE DISPOSAL

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	<i>Strategic Finance</i>				
1.3.1	Statement of financial activities for the year	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.2	Financial planning	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.3	Value for money statement	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.4	Records relating to the management of VAT	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.5	Whole of government accounts returns	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.6	Borrowing powers	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.7	Budget plan	No		Current financial year + 6 years	SECURE DISPOSAL

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.8	Charging and remissions policy	No		Date policy superseded + 3 years	SECURE DISPOSAL
	<i>Audit Arrangements</i>				
1.3.9	Audit Committee and appointment of responsible officers	No		Life of the Academy	SECURE DISPOSAL
1.3.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	SECURE DISPOSAL
1.3.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	SECURE DISPOSAL
	<i>Funding Agreements</i>				

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements ⁶	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.13	Funding Agreement – Termination of the funding agreement ⁷	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.14	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.15	Funding Records – Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL

⁶ Where there is multi-Academy governance.

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

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.16	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.17	Per pupil funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.18	Exclusions agreement ⁸	No		Date of last payment of funding + 6 years	SECURE DISPOSAL

⁸ The Academy can enter into an arrangement with a Local Authority (LA), so that payment will flow between the Academy and the LA, in the same way as it would do were the Academy a maintained school.

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.19	Funding records ⁹	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.20	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	SECURE DISPOSAL

⁹ Funding agreement which says that the Academy can receive donations and can only charge where the law allows maintained schools to charge [see Charging and Remission Policy].

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

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.23	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)	From the end of the year in which the accounts were signed for a minimum of 6 years	SECURE DISPOSAL
1.3.24	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.25	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.26	Payroll records	Yes		Date payroll run + 6 years	SECURE DISPOSAL
	<i>Risk Management and Insurance</i>				
1.3.27	Insurance policies	No		Date the policy expires + 6 years	SECURE DISPOSAL

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.28	Records relating to the settlement of insurance claims	No- unless it is a personal claim		Date claim settled + 6 years	SECURE DISPOSAL
1.3.29	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL
	<i>Endowment Funds and Investments</i>				
1.3.30	Investment policies	No		Life of the investment + 6 years	SECURE DISPOSAL
1.3.31	Management of Endowment Funds	No		Life of the fund + 6 years	
	<i>Accounts and Statements</i>				
1.3.32	Annual accounts	No		Current year + 6 years	STANDARD DISPOSAL

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.33	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
1.3.34	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.35	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL
1.3.36	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL

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

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	Asset Management				
1.3.42	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
1.3.43	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL
1.3.44	Records relating to the leasing of shared facilities, such as sports centres	No		Current year + 6 years	SECURE DISPOSAL
1.3.45	Land and building valuations	No		Date valuation superseded + 6 years	SECURE DISPOSAL
1.3.46	Disposal of assets	No		Date asset disposed of + 6 years	SECURE DISPOSAL
1.3.47	Community School leases for land	No		Date lease expires + 6 years	SECURE DISPOSAL

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.48	Commercial transfer arrangements	No		Date of transfer + 6 years	SECURE DISPOSAL
1.3.49	Transfer of land to the Academy Trust	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL
1.3.50	Transfers of freehold land	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL
	<i>School Fund</i>				
1.3.54	School Fund – Invoices	No		Current year + 6 years	SECURE DISPOSAL
1.3.55	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
1.3.56	School Fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL

1.3 Funding and Finance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.3.57	School Fund – Journey books	No		Current year + 6 years	SECURE DISPOSAL
	School Meals¹⁰				
1.3.58	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
1.3.59	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.60	<i>School meals summary sheets</i>	No		Current year + 3 years	SECURE DISPOSAL

¹⁰ 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.

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

1.4 Policies, Frameworks and Overarching Requirements					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.4.1	Data Protection Policy, including data protection notification	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.2	Freedom of Information Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.3	Information Security Breach Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL

1.4 Policies, Frameworks and Overarching Requirements					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
1.4.4	Special Educational Needs Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.5	Complaints Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.6	Risk and Control Framework	No		Life of framework + 6 years	SECURE DISPOSAL
1.4.7	Rules and Bylaws	No		Date rules or bylaws superseded + 6 years	SECURE DISPOSAL
1.4.9	Home School Agreements ¹¹	No		Date agreement revised + 6 years	SECURE DISPOSAL
1.4.10	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	SECURE DISPOSAL

¹¹ This should be drawn up in consultation with parents and should apply to all pupils.

2.Human Resources

2.1 Recruitment ¹²					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL

¹² 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 ¹²					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.1.4	Pre-employment vetting information – DBS Checks ¹³	No	DBS Update Service Employer Guide June 2014	The organisation should take a copy of the DBS certificate when it is shown to them by the individual and should be added to the Staff Personal File	SECURE DISPOSAL
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Where possible, these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File	SECURE DISPOSAL
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ¹⁴	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

¹³ Academies are bound by the legislation that applies to independent schools NOT maintained schools.

¹⁴ Employers are required to take a “clear copy” of the documents which they are shown as part of this process.

2.1 Recruitment ¹²					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.1.7	Records relating to the employment of overseas teachers	Yes		Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.8	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL

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

2.3 Management of Disciplinary and Grievance Processes					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded ¹⁵	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	Until the person’s normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			
	<ul style="list-style-type: none"> Oral warning 			Date of warning ¹⁶ + 6 months	SECURE DISPOSAL ¹⁷

¹⁵ 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.

¹⁶ 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.

¹⁷ If warnings are placed on personal files, then they must be weeded from the file.

2.3 Management of Disciplinary and Grievance Processes					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	<ul style="list-style-type: none"> Written warning – level 1 			Date of warning + 6 months	SECURE DISPOSAL ¹⁸
	<ul style="list-style-type: none"> Written warning – level 2 			Date of warning + 12 months	SECURE DISPOSAL ¹⁹
	<ul style="list-style-type: none"> Final warning 			Date of warning + 18 months	SECURE DISPOSAL ²⁰
	<ul style="list-style-type: none"> Case not found 			If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL

¹⁸ If warnings are placed on personal files, then they must be weeded from the file.

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

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

2.4 Health and Safety					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.4.1	Health and Safety policy statements	No		Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety risk assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.3	Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	SECURE DISPOSAL

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

2.4 Health and Safety					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
2.4.6	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No		Last action + 40 years	SECURE DISPOSAL
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire precautions log books	No		Current year + 6 years	SECURE DISPOSAL
2.4.9	Fire risk assessments	No	Fire Service Order 2005	Life of the risk assessment + 6 years	SECURE DISPOSAL
2.4.10	Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL

3.Management of the Academy

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

3.1 Admissions					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
3.1.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
3.1.4	Register of admissions	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made ²¹	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

²¹ School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014 p6.

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

3.1 Admissions					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	<ul style="list-style-type: none"> For unsuccessful admissions 			Until appeals process completed	SECURE DISPOSAL

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

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

3.2 Head Teacher and Senior Management Team					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
3.3.1	Management of complaints	Yes		Date complaint resolved + 3 years	SECURE DISPOSAL
3.3.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	SECURE DISPOSAL
3.3.3	Records relating to the management of software licences	No		Date licence expires + 6 years	SECURE DISPOSAL
3.3.4	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
3.3.5	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
3.3.6	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
3.3.7	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
3.3.8	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL

3.2 Head Teacher and Senior Management Team					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
3.3.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL

4. Property Management

This section covers the management of buildings and property.

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

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

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

4.3 Fleet Management					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.2	The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, maintenance	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.3	Service logs and vehicle logs	N	Limitation Act 1980 (Section 2)	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	SECURE DISPOSAL
4.3.4	GPS tracking data relating to the vehicles	N	Limitation Act 1980 (Section 2)	Date of journey + 6 years	SECURE DISPOSAL

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. Pupil Management

5.1 Pupil's Educational Record					
Currently, it is an offence to destroy any records that might be relevant to the <u>Independent Inquiry into Child Sexual Abuse (IICSA)</u> . This requirement overrides any UK data protection laws - see section 21 of the <u>Inquiries Act 2005</u> .					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	<ul style="list-style-type: none"> Primary 			Retain whilst the child remains at the primary school	The file should follow the pupil when they leave the primary school. This will include: <ul style="list-style-type: none"> To another primary school

5.1 Pupil's Educational Record					
Currently, it is an offence to destroy any records that might be relevant to the <u>Independent Inquiry into Child Sexual Abuse (IICSA)</u> . This requirement overrides any UK data protection laws – see section 21 of the <u>Inquiries Act 2005</u> .					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
					<ul style="list-style-type: none"> To a secondary school To a pupil referral unit <p>If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period.</p> <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period. 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</p>
	<ul style="list-style-type: none"> Secondary 		Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	SECURE DISPOSAL

5.1 Pupil's Educational Record					
Currently, it is an offence to destroy any records that might be relevant to the <u>Independent Inquiry into Child Sexual Abuse (IICSA)</u>. This requirement overrides any UK data protection laws – see section 21 of the <u>Inquiries Act 2005</u>.					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
5.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	SECURE DISPOSAL
5.1.3	Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be retained	
5.1.4	Examination results – pupil copies	Yes			
	<ul style="list-style-type: none"> Public 			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	<ul style="list-style-type: none"> Internal 			This information should be added to the pupil file	

5.1 Pupil's Educational Record					
Currently, it is an offence to destroy any records that might be relevant to the <u>Independent Inquiry into Child Sexual Abuse (IICSA)</u>. This requirement overrides any UK data protection laws – see section 21 of the <u>Inquiries Act 2005</u>.					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
5.1.5	Child protection information held on pupil file	Yes	“Keeping children safe in education Statutory guidance for schools and colleges “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file	SECURE DISPOSAL – these records MUST be shredded

5.1 Pupil's Educational Record					
Currently, it is an offence to destroy any records that might be relevant to the <u>Independent Inquiry into Child Sexual Abuse (IICSA)</u> . This requirement overrides any UK data protection laws – see section 21 of the <u>Inquiries Act 2005</u> .					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
5.1.6	Child protection information held in separate files	Yes	“Keeping children safe in education Statutory guidance for schools and colleges Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	SECURE DISPOSAL – these records MUST be shredded

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

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

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

5.3 Special Educational Needs					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.4	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold

6. Curriculum Management

6.1 Statistics and Management Information					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination results (schools copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	SATs records –	Yes			

6.1 Statistics and Management Information					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
	<ul style="list-style-type: none"> Results 			<p>The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years</p> <p>The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison</p>	SECURE DISPOSAL
	<ul style="list-style-type: none"> Examination papers 			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) reports	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value added and contextual data	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self-evaluation forms	Yes		Current year + 6 years	SECURE DISPOSAL

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

6.2 Implementation of Curriculum					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
6.2.5	Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL

6.2 Implementation of Curriculum					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
6.2.6	Pupils' work	No		Where possible, work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year	SECURE DISPOSAL

7. Extracurricular Activities

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

7.1 Educational Visits outside the Classroom					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
7.1.2	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Secondary schools	No	Outdoor Education Advisers' Panel National Guidance website specifically Section 3 – "Legal Framework and Employer Systems" and Section 4 – "Good Practice".	Date of visit + 10 years	SECURE DISPOSAL
7.1.3	Parental consent forms for school trips where there has been no major incident ²²	Yes		Conclusion of the trip	Although the consent forms could be retained for date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time

7.1 Educational Visits outside the Classroom					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
7.1.4	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	
7.1.5	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL

7.2 Walking Bus					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
7.2.1	Walking bus registers	Yes		<p>Date of register + 3 years.</p> <p>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</p>	<p>SECURE DISPOSAL</p> <p>[If these records are retained electronically any back up copies should be destroyed at the same time]</p>

8. Central Government and Local Authority (LA)

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