



Data Retention and Records Management Policy

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REVIEW HISTORY

| VERSION NO. | DATE OF CHANGE | CHANGE SUMMARY | PAGE NO. |
|-------------|-----------------|--|----------|
| 2.0 | 8 February 2023 | The CIF projects require us to keep financial records relating to these for 7 years. Updated retention period for financial papers to 7 years from +6 years due to CIF terms and conditions | |
| 3.0 | May 2023 | Updates from DPO to include addition of child abuse records | 6 |

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DATA RETENTION AND RECORDS MANAGEMENT POLICY

The Trust has a responsibility to maintain its records management and record keeping systems. When doing this, the Trust will take account of the following factors: -

- The most efficient and effective way of storing records and information.
- The confidential nature of the records and information stored.
- The security of the record systems used.
- Privacy and disclosure; and
- Their accessibility.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect the Trust's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the Trust from time to time and any changes will be notified to employees within one month of the date on which the change is intended to take effect. The Trust may also vary any parts of this procedure, including any time limits, as appropriate in any case.

DATA PROTECTION

This policy sets out how long employment-related and pupil data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the UK General Data Protection Regulation (GDPR) 2018, the Data Protection Act 2018 and the Freedom of Information Act 2000.

Data will be stored and processed to allow for the efficient operation of the Trust. The Trust's Data Protection Policy outlines its duties and obligations under the UK GDPR.

RECORDS MANAGEMENT

Management of records by a Public Authority is a legal obligation (Section 46 of the Freedom of Information Act 2000).

The Code issued on 15 July 2021 sets out key principles about records and their management. These are the:

- value of the information
- integrity of the information
- accountability for the information

There are a range of statutory, regulatory and guidance that oblige us to accept, create, use, edit, store, and dispose of records. It is necessary to establish clarity about records keeping systems.

Aims

- to effectively manage the records that are created and are integral to the operation of the trust
- to confirm a clear framework to manage records and information within the trust
- to provide an environment where records are stored securely
- to ensure that records are accessible to those who need them
- to ensure that the trust workforce responsible for records management understand these obligations
- to give effect to the s.46 Code of Practice our records management will take note of the principles it sets out

Scope

This policy applies to all records created, received or maintained by staff of the Trust, whether centrally or in individual schools, in the course of carrying out its functions.

Records that are shared with third parties as a result of consent, regulatory obligations or contractual agreements are within the scope of this policy.

Records exist in the Trust and in schools and originate from a variety of sources. Trust staff will create some. Others are provided by parents/carers and pupils, others are shared with the trust and its schools by external professionals. The policy applies to all records and the management of the records in the trust and its schools. See Appendix 1 for examples of records in the trust and schools.

Records may be hard copy, electronic, digital, images, audio recordings or any other source that can be viewed, heard or interrogated. They may relate to individuals, financial planning, contracts, commercial organisations, public authorities or charitable organisations. Some will include personal data about individuals.

Records may refer to individuals, financial planning tools, contracts, commercial organisations, public authorities, or charitable organisations. Some records will contain personal data.

Record retention and storage will be reviewed from time to time to ensure that the aims of this policy are met.

Responsibilities

The Trust has a corporate responsibility to maintain, use, store and delete its records to comply with regulatory requirements. The person with overall responsibility for this policy is the Chief Executive Officer, and this will be delegated to the headteacher and senior leadership team in each school.

Management of the policy will be reviewed at trustee board meetings on at least an annual basis.

The headteacher will be required to monitor compliance with this policy by undertaking at least an annual check to determine if records are stored securely and can be accessed appropriately, in accordance with requirements in this policy.

Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the Trust's policies and records management guidelines by ensuring that:

- records are handled in accordance with the trust policies and good practice for secure storage and usage
- accurate records are kept as required
- personal data contained in records is used in compliance with the UK GDPR and trust data protection policies and protocols
- personal information is shared appropriately and with a proper legal basis with any third party
- records are securely disposed in accordance with the trust's records retention schedule.

Child Abuse Records

The Independent Inquiry into Child Sexual Abuse (Final Report 2022) recommends that any records that relate (or could relate) to sexual abuse should be retained for 75 years or 10 years past the retirement of a relevant member of staff, whichever is the longer term. We shall implement this and ensure that notification of the relevant records is made in the event of any transfer.

RETENTION SCHEDULE

Information (hard copy and electronic) will be retained for at least the period specified in the retention schedule, see Appendix 2 or please contact admin@oaktrust.org for a paper copy. When managing records, the Trust will adhere to the standard retention times listed within that schedule. Paper and electronic records will be regularly monitored. The schedule documents the many types of records used by the Trust and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

DESTRUCTION OF RECORDS

Where records have been identified for destruction they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints, or grievances. All paper records containing personal

information, or sensitive policy information should be shredded before disposal where possible. All electronic information will be deleted.

The school should maintain a database of records which have been destroyed and who authorised their destruction (Appendix 3). When destroying documents, the appropriate staff member should record in this list at least: -

- File reference (or another unique identifier).
- File title/description.
- Number of files.
- Name of the authorising officer.
- Date destroyed or deleted from system; and
- Person(s) who undertook destruction.

RECORD KEEPING OF SAFEGUARDING

Any allegations made that are found to be malicious must not be part of the personnel records. For any other allegations made, the Trust must keep a comprehensive summary of the allegation made, details of how the investigation was looked into and resolved and any decisions reached. This should be kept on the personnel files of the accused.

Any allegations made of sexual abuse should be preserved by the Trust for the term of an inquiry by the Independent Inquiry into Child Sexual Abuse. All other records (for example, the personnel file of the accused) should be retained until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Guidance from the Independent Inquiry Child Sexual Abuse states that prolonged retention of personal data at the request of an Inquiry would not contravene data protection regulation provided the information is restricted to that necessary to fulfil potential legal duties that a Trust may have in relation to an Inquiry.

Whilst the Independent Inquiry into Child Sexual Abuse is ongoing, it is an offence to destroy any records relating to it. At the conclusion of the Inquiry, it is likely that an indication regarding the appropriate retention periods of the records will be made.

ARCHIVING

Where records have been identified as being worthy or necessary of preservation over the longer term, arrangements should be made to transfer the records to an archive. A database of the records sent to an archive is maintained by the school/MAT office team. The appropriate staff member, when archiving documents should record in this list the following information: -

- File reference (or another unique identifier).

- File title/description.
- Number of files; and
- Name of the authorising officer.

TRANSFERRING INFORMATION TO OTHER MEDIA

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

TRANSFERRING INFORMATION TO ANOTHER SCHOOL / TRUST

We retain the pupil's educational record whilst the child remains at the School / Trust. Once a pupil leaves a school, the file should be sent to their next School. The responsibility for retention or destruction then shifts onto the next School.

RESPONSIBILITY AND MONITORING

The Headteachers have primary and day-to-day responsibility for implementing this Policy. The Data Protection Officer, in conjunction with the Trust, is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation.

The Data Protection Officer will consider the suitability and adequacy of this policy and report improvements directly to management. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.

Management at all levels are responsible for ensuring those reporting to them, are made aware of and understand this Policy and are given adequate and regular training on it.

EMAILS

Emails accounts are not a case management tool. Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost.

PUPIL RECORDS

All Schools have a duty to maintain a pupil record for each pupil. Early Years may have their own separate record keeping requirements. If a child changes School, the responsibility for maintaining the pupil record moves to the next School.

DESTRUCTION

At the point of destruction, the 'Data Destruction Log' will be completed.

RELATIONSHIP WITH EXISTING POLICIES

This policy has been drawn up within the context of:

- Data Protection policy
- Information Security policy
- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the Trust and schools.

Appendix 1

The Trust and schools keep a wide variety of records that may include (but are not limited to):

Students

- Personal information
- Parent/carer contact information
- School reports
- Behaviour logs
- Exam and testing outcomes – internal and external
- Child protection information
- Allegations of a child protection nature made against a member of staff (including unfounded allegations)
- Attendance – attendance registers, authorised absence correspondence
- SEND – reviews, advice to parents/carers, accessibility strategy
- Pupil Premium / Sixth Form Bursary – evidence of eligibility
- Free School Meals eligibility
- Services and Pupil Premium eligibility
- LAC status
- Medical – Individual Health Plans, first aid records
- Biometric records

Management of the Trust and Schools

- Trust and Governing Board records – agendas, minutes, resolutions, reports
- Trustee and Governors personal details
- Declarations of Interests
- CPD and training
- Statutory Documents for Companies House
- Accounts and Trust Report
- School Development Plans and School Improvement plans
- Leadership meetings, minutes and actions
- Admission details
- School visitor logs
- Health and Safety Records
- Fire Risk Assessments
- Risk Assessments
- Social Media
- Newsletters and external communication records

Human Resources

- Job Descriptions

- Application forms
- Personnel files for all staff – including personal contact details
- Appraisals
- Performance reviews
- Employment suitability checks
- Contracts of employment
- Records of Disciplinary and Grievances Process
- Allegations and LADO referrals
- Referrals to the TRA and/or DBS
- Payroll and pensions – maternity/paternity pay, family leave records,

Financial Management

- Budgets and Funding details as required by the Funding Agreement, Academies Financial Handbook and Company Law
- Risk Management and Insurance – employer’s liability insurance certificate
- Asset Management Records
- Asset Register
- All necessary financial records
- Contracts
- Contract Management and Procurement
- School Payment and Meals Management

Property Management

- Property Management
- Condition Surveys
- Hire agreements
- Maintenance – logbooks, warranties and contractor information
- Health and safety information

Curriculum & Attainment

- Teaching and learning planning
- Timetabling and resource planning
- Prospectus and Website
- Statistics and evidence of learning outcomes, targets
- Pupil work records
- Trip and visit record

External Records

- Central Government and Local Authority
- Local Authority – census returns, attendance returns
- Central Government – returns made to DfE/ESFA

- Ofsted
- Referrals to third party agencies
- Legal action involving the trust and schools
- ICO action
- Enquiries and investigations by external bodies

Appendix 2: Retention Schedule

Introduction

This retention schedule contains recommended retention periods for the different record series created and maintained by the Trust in the course of its business. The schedule refers to all information regardless of the media in which it is stored. Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the Data Protection Act 2018 and the Freedom of Information Act 2000.

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

This schedule should be reviewed on a regular basis.

Using the Retention Schedule

The Retention Schedule is divided into five sections:

1. Management of the Trust and Academies
2. Human Resources
3. Financial Management of the Trust
4. Property Management
5. Pupil Management
6. Curriculum Management
7. Extra-Curricular Activities
8. Central Government and Local Authority

There are subheadings under each section to help guide you to the retention period you are looking for. Each entry has a unique reference number. If you are sending a query to the DPO about an individual retention period, please ensure that you have quoted the unique reference number.

1. Management of the Trust and Academies

This section contains retention periods connected to the general management of the Academy & Trust. This covers the work of the Board of Trustees, LGC's, CEO, Headteachers and the senior management teams, the admissions process and operational administration.

| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
|-------|---|--|---|---|----------------------------------|
| 1.1.1 | Agendas for Local Governing Committee and/or Trust Board meetings | There may be data protection issues if the meeting is dealing with confidential issues relating to staff | One copy should be retained with the master set of minutes. All other copies can be disposed of | SECURE DISPOSAL ¹ | |
| 1.1.2 | Minutes of Local Governing Committee and/or Trust Board meetings | There may be data protection issues if the meeting is dealing with confidential issues relating to staff | | | |
| | Principal Set (signed) | | PERMANENT | If the Academy/ Trust is unable to store these then a secure 3rd party Archive facility should be used. | |
| | Inspection Copies ² | | Date of meeting + 3 years | If these minutes contain any sensitive, personal information they must be shredded. | |

¹ 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 crosscut shredder.

² These are the copies which the clerk to the Governor may wish to retain so that requestors can view all the appropriate information without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

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|-------|--|--|---|--|--|
| 1.1.3 | Reports presented to the Governing Committee and/or Trust Board | There 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 permanently | SECURE DISPOSAL or retain with the signed set of the minutes | |
| 1.1.4 | Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002 | No | Date of the meeting + a minimum of 6 years | SECURE DISPOSAL | |

| 1.1 Governing Body (continued...) | | | | | |
|-----------------------------------|---|------------------------|-----------------------------------|---|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 1.1.5 | Instruments of Government including Articles of Association | No | PERMANENT | These should be retained in the Academy whilst the Academy is open and then offered to the Trust or appropriate Archives Service when the Academy closes. | |
| 1.1.6 | Trusts and Endowments managed by the Local Governing Committee and/or Trustees | No | PERMANENT | These should be retained in the Academy whilst the Academy is open and then offered to the Trust or appropriate Archives Service when the Academy closes. | |
| 1.1.7 | Action plans created and administered by the Local Governing Committee and/or Trust Board | No | Life of the action plan + 3 years | SECURE DISPOSAL | |
| 1.1.8 | Policy documents created and administered by the Local Governing Committee and/or Trust Board | No | Life of the policy + 3 years | SECURE DISPOSAL | |

| | | | | | |
|--------|---|-----|--|-----------------|--|
| 1.1.9 | Records relating to complaints dealt with by the Local Governing Committee and/or Trust Board | 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 | |
| 1.1.10 | Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 | No | Date of report + 10 years | SECURE DISPOSAL | |
| 1.1.11 | Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies | No | Date proposal accepted or declined + 3 years | SECURE DISPOSAL | |
| 1.1.12 | Register of attendance at Trust and LGB meetings | | Date of last meeting in the book + 6 years | | |
| 1.1.13 | Records relating to Governor Monitoring Visits | | Date of the visit + 3 years | | |
| 1.1.14 | Records relating to complaints made to and investigated by the Governing Body (ie stage 3 complaints) | | Date of resolution of complaint + 6 years then review for further retention in the case of contentious disputes | | |

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|--------|--|--|--|--|--|
| 1.1.15 | Appointment and termination of Trustees/Directors/Governors | | | | |
| 1.1.16 | Records relating to the terms of office of serving directors/governors including evidence of appointment | | PERMANENT | | |
| 1.1.17 | Records relating to Director/Governor Declaration against disqualification criteria | | Until the governor steps down | | |
| 1.1.18 | Register of Business Interests | | PERMANENT | | |
| 1.1.19 | Director/Governors Code of Conduct signed | | This is expected to be a dynamic document, one copy of each version should be kept permanently | | |
| 1.1.20 | Records relating to DBS checks carried out on clerk, directors and members of the governing body (certificate number to be retained) | | Date of DBS check + 6 months | | |
| 1.1.21 | Records relating to the appointment of foundation directors or governors | | Permanent | | |

| | | | | | |
|--------|--|--|---|--|--|
| 1.1.22 | Records relating to the election of parent governors | | Date of election + 6 months | | |
| 1.1.23 | Records relating to the election of chair and vice chair | | Once the decision has been recorded in the minutes, the records relating to the election can be destroyed | | |

| 1.2 Head Teacher and Senior Management Team | | | | | |
|---|---|--|---|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 1.2.1 | Logbooks ³ of activity in the school maintained by the Head Teacher ⁱ | There may be data protection issues if the logbook 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 | |
| 1.2.2 | Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies | There may be data protection issues if the minutes refers to individual pupils or members of staff | Date of the meeting + 3 years then review | SECURE DISPOSAL | |

³ Logbooks can be regarded as a diary of school life with the Head Teacher writing up everything that happens of note at the school

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|-------|--|---|---|-----------------|--|
| 1.2.3 | 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 | |
| 1.2.4 | 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 | |
| 1.2.5 | 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 | |
| 1.2.6 | Professional Development Plans ⁴ | Yes | Life of the plan + 6 years | SECURE DISPOSAL | |
| 1.2.7 | School Development Plans | No | Life of the plan + 3 years | SECURE DISPOSAL | |

⁴ Refers to action plans and similar relating to CPD within the staff body.

| 1.3 Admissions Process | | | | | |
|------------------------|--|------------------------|--|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 1.3.1 | All records relating to the creation and implementation of the School Admissions' Policy | No | Life of the policy + 3 years then review | SECURE DISPOSAL | |
| 1.3.2 | Admissions – if the admission is successful | Yes | Date of admission + 1 year | SECURE DISPOSAL | |
| 1.3.3 | Admissions – if the appeal is unsuccessful | Yes | Resolution of case + 1 year | SECURE DISPOSAL | |
| 1.3.4 | Register of Admissions | Yes | Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made. ³ | 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. | |
| 1.3.5 | Admissions – Secondary Schools – Casual | Yes | Current year + 1 year | SECURE DISPOSAL | |

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|-------|--|-----|--|-----------------|--|
| 1.3.6 | Proofs of address supplied by parents as part of the admissions process | Yes | Current year + 1 year | SECURE DISPOSAL | |
| 1.3.7 | Supplementary Information form including additional information such as religion, medical conditions etc | Yes | | | |
| | For successful admissions | | This information should be added to the pupil file | SECURE DISPOSAL | |
| | For unsuccessful admissions | | Until appeals process completed | SECURE DISPOSAL | |
| 1.3.8 | Exclusions and Suspension | | DOB of the pupil + 25 years | | |

| 1.4 Operational Administration | | | | | |
|--------------------------------|---|------------------------|------------------------------------|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 1.4.1 | Records relating to the creation and publication of the school brochure or prospectus | No | Current year + 3 years | STANDARD DISPOSAL | |
| 1.4.2 | Records relating to the creation and distribution of circulars to staff, parents or pupils | No | Current year + 1 year | STANDARD DISPOSAL | |
| 1.4.3 | Newsletters and other items with a short operational use | No | Current year + 1 year | STANDARD DISPOSAL | |
| 1.4.4 | Visitors' Books and Signing in Sheets | Yes | Current year + 6 years then REVIEW | SECURE DISPOSAL | |
| 1.4.5 | 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 | |

2. Human Resources

This section deals with all matters of Human Resources management within the school.

| 2.1 Recruitment | | | | | |
|-----------------|--|------------------------|---|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 2.1.1 | All records leading up to the appointment of a new headteacher | Yes | Date of appointment + 6 years | SECURE DISPOSAL | |
| 2.1.2 | All records leading up to the appointment of a new member of staff – unsuccessful candidates | Yes | Date of appointment of successful candidate + 6 months | SECURE DISPOSAL | |
| 2.1.3 | All records leading up to the appointment of a new member of staff – successful candidate | Yes | All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months | SECURE DISPOSAL | |
| 2.1.4 | Pre-employment vetting information – DBS Checks | No | The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months | | |

| | | | | | |
|-------|--|-----|---|--|--|
| 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 placed on the member of staff's personal file | | |
| 2.1.6 | Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ⁴ | Yes | Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years | | |
| 2.1.7 | Online presence pre-employment check | | Termination of employment + 2 years | | |

| 2.2 Operational Staff Management | | | | | |
|---|-------------------------------|-------------------------------|---------------------------------------|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 2.2.1 | Staff Personal File | Yes | 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 | Images held of members of staff together with any consents and permissions to publish | | Specify in Privacy Notice how photos of members of staff will be used and duration of use. | | |
| 2.2.5 | Staff personal information - e.g. medical appointments | | Review in line with HR guidance and school policy | | |

| 2.3 Management of Disciplinary and Grievance Processes | | | | | |
|---|--|-------------------------------|---|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 2.3.1 | Records of allegations about workers who have been investigated and found to be without substance ⁵ | Yes | These records should not normally be retained once an investigation has been completed. | SECURE DISPOSAL These records must be shredded | |

⁵ There are some exceptions to this where for its own protection the employer has to keep a limited record that an allegation was received and investigated, for example where the allegation relates to abuse and the worker is employed to work with children or other vulnerable adults

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|-------|--|-----|--|--|--|
| 2.3.2 | Outcome of an allegation made against a staff member | | Until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer | | |
| 2.3.3 | Disciplinary Proceedings | Yes | | | |
| | written warning – level 1 | | Date of warning + 6 months | SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file] | |
| | Final warning | | Date of warning + 12 months | | |
| | case not found | | If the incident is child protection related then see above otherwise dispose of at the conclusion of the case | SECURE DISPOSAL | |
| 2.3.4 | Low Level Concerns | | Dependant on the nature of the incident – minimum 24 months of the record | | |

| 2.4 Health and Safety | | | | | |
|-----------------------|---|------------------------|--|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 2.4.1 | Health and Safety Policy Statements | No | Life of policy + 3 years | SECURE DISPOSAL | |
| 2.4.2 | Health and Safety Risk Assessments | No | Life of risk assessment + 3 years | SECURE DISPOSAL | |
| 2.4.3 | Records relating to accident/ injury at work | Yes | Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied | SECURE DISPOSAL | |
| 2.4.4 | Accident Reporting of RIDDOR reports | Yes | | | |
| | Adults | | Date of the incident + 4 years | SECURE DISPOSAL | |
| | Children | | DOB of the child + 22 years | SECURE DISPOSAL | |
| 2.4.5 | Control of Substances Hazardous to Health (COSHH) | No | Current year + 40 years | SECURE DISPOSAL | |
| 2.4.6 | Process of monitoring of areas where employees and persons are likely to have become in 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 become in 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 Payroll and Pensions | | | | | |
|---------------------------------|--|-------------------------------|---------------------------------------|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 2.5.1 | Maternity pay records | Yes | Current year + 3 years | SECURE DISPOSAL | |
| 2.5.2 | Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Yes | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.3 | Timesheets, sick pay | Yes | Current year + 6 years | | |

3. Financial Management of the School

This section deals with all aspects of the financial management of the school including the administration of school meals

| 3.1 Risk Management and Insurance | | | | | |
|-----------------------------------|--|------------------------|----------------------------------|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 3.1.1 | Employer's Liability Insurance Certificate | No | Closure of the school + 40 years | SECURE DISPOSAL | |

| 3.2 Asset Management | | | | | |
|----------------------|--|------------------------|--------------------------------|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 3.2.1 | Inventories of furniture and equipment | No | Current year + 7 years | SECURE DISPOSAL | |
| 3.2.2 | Burglary, theft and vandalism report forms | No | Current year + 7 years | SECURE DISPOSAL | |

| 3.3 Accounts and Statements including Budget Management | | | | | |
|---|--|------------------------|---|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 3.3.1 | Annual Accounts | No | Current year + 7 years | STANDARD DISPOSAL | |
| 3.3.2 | Loans and grants managed by the school | No | Date of last payment on the loan + 12 years then REVIEW | SECURE DISPOSAL | |
| 3.3.3 | Student Grant applications | Yes | Current year + 3 years | SECURE DISPOSAL | |

| | | | | | |
|-------|--|----|----------------------------------|-----------------|--|
| 3.3.4 | 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 | |
| 3.3.5 | Invoices, receipts, order books and requisitions, delivery notices | No | Current financial year + 7 years | SECURE DISPOSAL | |
| 3.3.6 | Records relating to the collection and banking of monies | No | Current financial year + 7 years | SECURE DISPOSAL | |
| 3.3.7 | Records relating to the identification and collection of debt | No | Current financial year + 7 years | SECURE DISPOSAL | |

| 3.4 Contract Management | | | | | |
|--------------------------------|---|-------------------------------|--|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 3.4.1 | All records relating to the management of contracts under signature | No | Last payment on the contract + 7 years | SECURE DISPOSAL | |
| 3.4.2 | Records relating to the monitoring of contracts | No | Current year + 2 years | SECURE DISPOSAL | |

| 3.5 School Fund | | | | | |
|------------------------|-------------------------------|-------------------------------|---------------------------------------|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |

| | | | | | |
|-------|----------------------------------|----|---------------------------|-----------------|--|
| 3.5.1 | School Fund – Cheque books | No | Current year + 7 years | SECURE DISPOSAL | |
| 3.5.2 | School Fund – Paying in books | No | Current year + 7 years | SECURE DISPOSAL | |
| 3.5.3 | School Fund – Ledger | No | Current year + 7 years | SECURE DISPOSAL | |
| 3.5.4 | School Fund – Invoices | No | Current year + 7 years | SECURE DISPOSAL | |
| 3.5.5 | School Fund – Receipts | No | Current year + 7 years | SECURE DISPOSAL | |
| 3.5.6 | School Fund – Bank statements | No | Current year + 7 years | SECURE DISPOSAL | |
| 3.5.7 | School Fund – Journey Books | No | Current year + 7 years | SECURE DISPOSAL | |

| 3.6 School Meals | | | | | |
|-------------------------|--|-----------------------------------|---|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 3.6.1 | Free School Meals Registers | Yes | Current year + 7 years | SECURE DISPOSAL | |
| 3.6.2 | School Meals Registers | Yes | Current year + 3 years | SECURE DISPOSAL | |
| 3.6.3 | School Meals Summary Sheets | No | Current year + 3 years | SECURE DISPOSAL | |
| 3.6.4 | Records relating to the management of data subject access requests | Yes | Current year + 3 years | | |

| | | | | | |
|-------|---|-----|------------------------|--|--|
| 3.6.5 | Records relating to the management of freedom of information requests | Yes | Current year + 3 years | | |
| 3.6.6 | Records relating to the management of PTA/Old Pupils Associations | Yes | Current year + 6 years | | |

4. Property Management

This section covers the management of buildings and property.

| 4.1 Property Management | | | | | |
|-------------------------|---|------------------------|--|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 4.1.1 | Title deeds of properties belonging to the school | No | PERMANENT These should follow the property unless the property has been registered with the Land Registry | | |
| 4.1.2 | Plans of property belong 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 + 7 years | SECURE DISPOSAL | |

| | | | | | |
|-------|--|----|----------------------------------|-----------------|--|
| 4.1.4 | Records relating to the letting of school premises | No | Current financial year + 7 years | SECURE DISPOSAL | |
|-------|--|----|----------------------------------|-----------------|--|

| 4.2 Maintenance | | | | | |
|------------------------|---|-------------------------------|---------------------------------------|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 4.2.1 | All records relating to the maintenance of the school carried out by contractors | No | Current year + 7 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 + 7 years | SECURE DISPOSAL | |

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 | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 5.1.1 | Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 | Yes | | | |
| | Primary | | Retain whilst the child remains at the primary school | The file should follow the pupil when he/she leaves the primary school. ⁶ | |
| | Secondary | | Date of Birth of the pupil + 25 years | SECURE DISPOSAL | |
| 5.1.2 | Examination Results – Pupil Copies | Yes | | | |
| | Public | | Year of examinations +6 years This information should be added to the pupil file | All uncollected certificates should be returned to the examination board. | |

⁶ This will include: (i) to another primary school (ii) to a secondary school (iii) to a pupil referral unit (iv) If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period. Primary Schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the record from the Local Authority

| | | | | | |
|-------|---|--|---|--|--|
| | Internal | | <p>Current year + 5 years</p> <p>This information should be added to the pupil file</p> <p>If these records are retained on the pupil file or in their National Record of Achievement they need only be kept for as long as operationally necessary</p> | | |
| 5.1.3 | Any other records created in the course of contact with pupils | | Current year + 3 years then review | | |
| 5.1.4 | Images held of pupils together with any consents and permissions to publish | | All records relating to the image should be retained for the life of the image. The length of time the image is to be retained should be included on the privacy statement | | |
| 5.1.5 | Child Protection information held on pupil file | | If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file. | SECURE DISPOSAL – these records MUST be shredded | |

| | | | | | |
|-------|---|--|--|--|--|
| 5.1.6 | Child protection information held in separate files | | DOB of the child + 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record | SECURE DISPOSAL – these records MUST be shredded | |
| 5.1.7 | Child abuse records (IISCA) | | Retained for 75 years | | |

| 5.2 Attendance | | | | | |
|----------------|---|------------------------|---|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 5.2.1 | Proofs of address supplied by parents as part of the admissions process | | Current year + 1 year | | |
| 5.2.2 | Attendance Registers | Yes | Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made. | SECURE DISPOSAL | |
| 5.2.3 | Medical and allergy information (including IHCP and PEEP) | | DOB of pupil + 25 years then review unless legal action is pending. If so, it may be appropriate to add an additional retention period. | | |

| | | | | | |
|-------|---|--|---------------------------------|-----------------|--|
| 5.2.4 | Correspondence relating to authorised absence | | Current academic year + 2 years | SECURE DISPOSAL | |
| 5.2.5 | Secondary Transfer Sheets (Primary) | | Current year + 2 years | | |

| 5.3 Special Educational Needs | | | | | |
|-------------------------------|------------------------|------------------------|--------------------------------|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| | | | | | |

| | | | | | |
|-------|---|-----|--|---|--|
| 5.3.1 | Special Educational Needs files, reviews and Individual Education Plans | Yes | Date of Birth of the pupil + 25 years | <p>REVIEW</p> <p>NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.</p> | |
| 5.3.2 | Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement | Yes | Date of birth of the pupil + 30 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold | |

| | | | | | |
|-------|---|--|---|--|--|
| 5.3.3 | Proposed EHCP or Draft Plan | | Date of birth of the pupil + 30 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold | |
| 5.3.4 | Advice and information to parents regarding educational needs | | Closure + 12 years Unless legal action is pending | SECURE DISPOSAL unless the document is subject to a legal hold | |
| 5.3.5 | Pupil SEN Files | | DOB of pupil + 25 years then review unless legal action is pending. If so, it may be appropriate to add an additional retention period. | | |

6. Curriculum Management

| 6.1 Statistics and Management Information | | | | | |
|---|--|------------------------|--------------------------------|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 6.1.1 | Minutes of the Senior Management Team and other internal administrative bodies | | Date of meeting + 5 years | | |
| 6.1.2 | Reports made by the Head Teacher or the management team | | Date of report + 3 years | | |

| | | | | | |
|-------|--|-----|---|-----------------|--|
| 6.1.3 | Correspondence created by Head Teachers, Deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities | | Date of correspondence + 3 years | | |
| 6.1.4 | Professional development plans | | Closure + 6 years | | |
| 6.1.5 | Curriculum returns | No | Current year + 3 years | SECURE DISPOSAL | |
| 6.1.6 | Examination Results (Schools Copy) | Yes | Current year + 6 years | SECURE DISPOSAL | |
| | SATS records – | Yes | | | |
| | Results | | The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATS results. These could be kept for current year + 6 years to allow suitable comparison | SECURE DISPOSAL | |
| | Examination Papers | | The examination papers should be kept until any appeals/validation process is complete | SECURE DISPOSAL | |
| 6.1.7 | Published Admission Number (PAN) Reports | Yes | Current year + 6 years | SECURE DISPOSAL | |

| | | | | | |
|-------|---------------------------------|-----|------------------------|-----------------|--|
| 6.1.8 | Value Added and Contextual Data | Yes | Current year + 6 years | SECURE DISPOSAL | |
| 6.1.9 | Self-Evaluation Forms | Yes | Current year + 6 years | SECURE DISPOSAL | |

| 6.2 Implementation of Curriculum | | | | | |
|----------------------------------|------------------------|------------------------|---|---|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 6.2.1 | Schemes of Work | No | Current year + 1 year | 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 | | |
| 6.2.3 | Class Record Books | No | Current year + 1 year | | |
| 6.2.4 | Mark Books | No | Current year + 1 year | | |
| 6.2.5 | Record homework set | No | Current year + 1 year | | |
| 6.2.6 | Pupils' Work | No | Where possible pupils' 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. Extra Curriculum Management

| 7.1 Educational Visits outside the Classroom | | | | | |
|--|------------------------|------------------------|--------------------------------|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |

| | | | | | |
|-------|---|-----|---|---|--|
| 7.1.1 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools | No | Date of visit + 14 years | SECURE DISPOSAL | |
| 7.1.2 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools | No | Date of visit + 10 years | SECURE DISPOSAL | |
| 7.1.3 | Parental consent forms for school trips where there has been no major incident | Yes | Conclusion of the trip | Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time. | |
| 7.1.4 | Parental permission slips for school trips – where there has been a major incident | Yes | DOB 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 | | |

| 7.2 Walking Bus | | | | | |
|-----------------|------------------------|------------------------|--|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 7.2.1 | Walking Bus Registers | Yes | Date of register + 3 years This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting | SECURE DISPOSAL [If these records are retained electronically any backup copies should be destroyed at the same time] | |

| 7.3 Family Liaison Officers and Home School Liaison Assistants | | | | | |
|--|--|------------------------|---|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 7.3.1 | Day Books | Yes | Current year + 2 years then review | | |
| 7.3.2 | Reports for outside agencies - where the report has been included on the case file created by the outside agency | Yes | Whilst child is attending school and then destroy | | |
| 7.3.3 | Referral forms | Yes | While the referral is current | | |
| 7.3.4 | Contact data sheets | Yes | Current year then review, if contact is no longer active then destroy | | |

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

8. Central Government and Local Authority

| 8.1 Local Authority | | | | | |
|---------------------|---|------------------------|--------------------------------|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 8.1.1 | Secondary Transfer Sheets (Primary) | Yes | Current year + 2 years | SECURE DISPOSAL | |
| 8.1.2 | Attendance Returns | Yes | Current year + 1 year | SECURE DISPOSAL | |
| 8.1.3 | School Census Returns | No | Current year + 5 years | SECURE DISPOSAL | |
| 8.1.4 | Circulars and other information sent from the Local Authority | No | Operational use | SECURE DISPOSAL | |

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

Appendix A – List of School Records and Data safely destroyed

The following sheet can be completed or alternatively documented in a spreadsheet.

| Ref Number | File/Record Title | Description | Reference or Cataloguing Information | Number of Files Destroyed | Method of destruction | <u>Confirm</u> (i) Safely destroyed (ii) In accordance with Data Retention Guidelines Tick (✓) |
|-------------|------------------------|--|--|---------------------------|-----------------------|---|
| <i>e.g.</i> | <i>School Invoices</i> | <i>Copies of purchase invoices dated 2011/12</i> | <i>Folders marked "Purchase Invoices 2011/12" 1 to 3</i> | <i>3 Folders</i> | <i>Shredding</i> | ✓ |
| 1 | | | | | | |
| 2 | | | | | | |
| 3 | | | | | | |
| 4 | | | | | | |
| 5 | | | | | | |
| 6 | | | | | | |
| 7 | | | | | | |
| 8 | | | | | | |
| 9 | | | | | | |
| 10 | | | | | | |

| Ref Number | File/Record Title | Description | Reference or Cataloguing Information | Number of Files Destroyed | Method of destruction | <u>Confirm</u> (i) Safely destroyed (ii) In accordance with Data Retention Guidelines Tick (✓) |
|------------|-------------------|-------------|--------------------------------------|---------------------------|-----------------------|---|
| 11 | | | | | | |
| 12 | | | | | | |
| 13 | | | | | | |
| 14 | | | | | | |

Appendix 3



Data Destruction
Log.xlsx
