



Records Retention and Deletion Policy for ACT and the following Academies:

Our Lady and Lourdes Catholic Primary School
Sacred Heart Catholic Primary School
St Helen's Catholic Primary School
Holy Family Catholic Primary School
St Joseph's Catholic Primary School
St Teresa's Catholic Primary School
St George's Catholic Primary School
Our Lady of Ransom Catholic Primary School
St Thomas More High School

This Policy has been approved and adopted by the Assisi Catholic Trust in September 2023 and will be reviewed in September 2026.

Committee Responsible: Audit and Risk Committee

Assisi Catholic Trust Mission Statement

Our mission is to inspire the children in our care and that our schools place Christ and the teaching of the Catholic Church at the centre of all we do. We believe that every child has a right to educational excellence, and we are committed in partnership to ensure this happens.

Motto

'Start doing what is necessary, then do what's possible and suddenly you are doing the impossible'

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Controlled Document

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1	20/09/2021	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	New Policy
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1. Background

This records retention and deletion policy contains recommended retention periods for the different record series created and maintained by Assisi Catholic Trust and the Academies in the course of our 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 UK General Data Protection Regulation (GDPR), Data Protection Act 2018 (DPA) and the Freedom of Information Act 2000 (FOI).

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.

Where this Policy states ‘Schools’ it shall mean all the Academies in the Assisi Catholic Trust. In this Policy ‘we’, ‘us’ and ‘our’ means the Trust and Academies.

2. Document Retention

Introduction

- i. The main aim of this policy is to enable Assisi Catholic Trust (the Trust) to manage hard and electronic records effectively and in compliance with the UK General Data Protection Regulation (GDPR). As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides the framework of retention and disposal of categories of information and documents.
- ii. The Trust is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.
- iii. The table below sets out the main categories of information that we hold, the length of time that we intend to hold them, and the reason for this.
- iv. For information, Appendix A sets out the legal and other requirements of certain categories of document. Where we have decided to keep information longer than the statutory requirement, this has been explained in the tables in Appendix A.
- v. Section 2 of this policy sets out the destruction procedure for documents at the end of their retention period. Any questions regarding this should be referred to the Trust’s Data Protection Officer: Email: dpo@assiscatholictrust.com
- vi. If a document or piece of information is reaching the end of its stated retention period, but you are of the view that it should be kept longer, please refer to the Data Protection Officer, using the contact information provided above, who will consult with the appropriate personnel and make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.

3. Benefits of a Retention Schedule

There are a number of benefits which arise from the use of a complete retention schedule:

- a) Managing records in line with best practice guidance fulfils duties under Section 46 Code of Practice on Records Management under the Freedom of Information Act 2000. Retention Guidelines are published so there is clear communication to customers over what information should still be available to them if they wish to make a subject access request. To retain information for too long or to destroy it too soon leaves us open to criticisms on openness and transparency, and in some cases, compliance with the Law.
- b) Members of staff can be confident about the safe disposal of information at the appropriate time.
- c) Information which is subject to Freedom of Information and Data Protection legislation will be available when required.
- d) The school is not maintaining and storing information unnecessarily.
- e) Members of staff should be aware that once a Freedom of Information request is received, or a legal hold imposed, then records disposal relating to the request or legal hold must be stopped.
- f) Records which may be required by IICSA (Independent Inquiry into Child Sexual Abuse) should be treated as though they are subject to a legal hold.

4. Maintaining and Amending the Retention Schedule

- i. Where appropriate the retention schedule should be reviewed and amended to include any new record series created and remove any obsolete record series.
- ii. Some of the retention periods are governed by statute and if record series are to be kept for longer or shorter periods than laid out in this document then the reason(s) for this needs to be documented.
- iii. Where there is a recommendation to archive the information, this may be in an electronic format. There is no requirement to convert the information into a hard copy. Such records should be kept in separate electronic folder suitably marked as holding archival material.

5. Deletion and Retention of Documents

5a. Destruction of records

Where records have been identified for destruction, they should be disposed of in an appropriate way. All records containing personal information, or sensitive personal information should be shredded before disposal (if possible). Any other records should be bundled up and disposed of to a wastepaper merchant or disposed of in other ways.

The Freedom of Information Act 2000 requires a list of records which have been destroyed to be maintained and who authorised their destruction. Members of staff should record at least:

- File reference (or another unique identifier);
- File title (or brief description);
- Number of files
- The name of the authorising officer

This could be kept in an Excel spreadsheet or other database format.

5b. Transfer of records to the Local Authority

Where records have been identified as being worthy of permanent preservation, arrangements should be made to transfer the records to the Local Authority

5c. Transfer of 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. The lifespan of the media and the ability to migrate data where necessary should always be considered.

5d. Individual Responsibility

Everyone is responsible for:

- Following procedures and guidance for managing, retaining, and disposing of records.
- Only disposing of records in accordance with the requirements outlined in this policy (if authorised to do so).
- Ensuring that any proposed divergence from the records retention and disposal policies is authorised by the Head Teacher.

6. Links with Other Policies

This Records Retention and Deletion Policy is linked to the Trust's:

- Data Protection Policy
- Freedom of Information Policy
- CCTV Policy
- Information Sharing Policy
- Safe-guarding Policy
- GDPR Privacy Notices

7. References

- UK General Data Protection Regulation
- Data Protection Act 2018
- Article 8, The Human Rights Act 1998
- Freedom of Information Act 2000
- Code of Practice on Records Management (under Section 46 of the FOIA)

1.1 Governance of the Academy Trust

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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
1.1.4	Memorandum of Understanding of Shared Governance among School	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
1.1.11	Annual Report – Trustees Report	No	<i>Companies Act 2006 section 335</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 335</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
1.1.17	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 1960 (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	Action at end of administrative life of the record
	<b style="color: #00AEEF;">Board of Directors				
1.2.1	Board Meeting Minutes	Possibly 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	Possibly if decisions refer to living individuals		Date of 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 of conduct of meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	Secure disposal
	<b style="color: #00AEEF;">Committees				
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
	<b style="color: #00AEEF;">General Members' Meeting				
1.2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	Offer to archives

1.2.7	Records relating to the management of the Annual General 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	Offer to archives
	Governors				
1.2.8	Agendas for Governing Body meetings	May be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	Secure disposal
1.2.9	Minutes of and papers considered at meetings of the Governing Body and its committees				
	Principal Set (Signed)			Life of Academy	
	Inspection copies			Date of meeting + 3 years	Secure disposal
1.2.10	Reports presented to the Governing Body	May be data protection issues if the report deals with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy	Secure disposal or retain with the signed set of minutes
1.2.11	Meeting papers relating to the annual parents meeting held under Section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	Secure disposal
1.2.12	Trusts and endowments managed by the Governing Body	Yes		Permanent	
1.2.13	Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	Secure disposal
1.2.14	Annual Reports created under the requirements of the Education (Governor's	No	Education (Governor's Annual Reports) (England)	Date of report + 10 years	

	Annual Reports) (England) (Amendment) Regulations 2002		(Amendment)Regulations 2002 SI 2002 No 1171		
	Statutory Registers				
1.2.15	Register of Directors		Companies Act 2006	Life of the Academy + 6 years	Secure disposal
1.2.16	Register of Directors' interests (this is not a statutory register)				
1.2.17	Register of Directors' residential addresses		Companies Act 2006		
1.2.18	Register of gifts, hospitality and entertainments				
1.2.19	Register of members				
1.2.20	Register of secretaries				
1.2.21	Register of Trustees interests				
1.2.22	Declaration of Interests Statements (Governors) (this is not a statutory register)				

1.3 Funding and Finance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
	Strategic Finance				
1.3.1	Statement of financial activities for the year	No		Current financial year + 6 years	Secure disposal

1.3.2	Financial planning	No	Reporting of Injuries, Diseases and Dangerous Occurrences Regulation 1995	Current financial year + 6 years	Secure disposal
1.3.3	Value for money statement	No			
1.3.4	Records relating to the management of VAT	No			
1.3.5	Whole of government accounts returns	No			
1.3.6	Borrowing powers	No			
1.3.7	Budget plan	No			
1.3.8	Charging and remissions policy	No		Date policy superseded + 3 years	
	Audit Arrangements				
1.3.9	Audit committee and appointment of responsible officers	No		Life of Academy	Secure disposal
1.3.10	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	
1.3.11	Independent Auditor's report on regularity	No			
	Funding Agreements				
1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements	No		Date of last payment of funding + 6 years	Secure disposal

1.3.13	Funding Agreement – Termination of the funding agreement			Date of last payment of funding + 6 years	Secure disposal	
1.3.14	Funding records – Capital Grant	No				
1.3.15	Funding Records – Earmarked Annual Grant (EAG)	No				
1.3.16	Funding Records – General Annual Grant (GAG)	No				
1.3.17	Per pupil funding records	No				
1.3.18	Exclusion’s agreement	No				
1.3.19	Funding record	No				
1.3.20	Gift Aid and Tax Relief	No				
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
	Payroll and Pensions					
1.3.22	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960) revised 1999 (SI 1999/567)	Current year + 3 years	Secure disposal	

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' Pensions Scheme	Yes		Date of last payment on the pension + 6 years	
1.3.25	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	
1.3.26	Payroll records	Yes		Date payroll run + 6 years	
Risk Management and Insurance					
1.3.27	Insurance policies	No		Date the policy expires + 6 years	Secure disposal
1.3.28	Records relating to the settlement of insurance claims	No		Date claim settled + 6 years	
1.3.29	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	
Endowment Funds and Investments					
1.3.30	Investment policies	No		Life of the investment + 6 years	Secure disposal
1.3.31	Management of Endowment funds	No		Life of the fund + 6 years	
Accounts and Statements					
1.3.32	Annual accounts	No		Current year + 6 years	Standard disposal
1.3.33	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then review	Secure disposal
1.3.34	Student grant applications	Yes		Current year + 3 years	

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	
1.3.37	Records relating to the collection and banking of monies	No			
1.3.38	Records relating to the identification and collection of debt	No			
	Contract Management				
1.3.39	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	Secure disposal
1.3.40	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	
1.3.41	Records relating to the monitoring of contracts	No		Current year + 2 years	
	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			
1.3.45	Land and building valuation	No		Date valuation superseded + 6 years	
1.3.46	Disposal of assets	No		Date asset disposed of + 6 years	
1.3.47	Community School leases for land	No		Date lease expires + 6 years	
1.3.48	Commercial transfer arrangement	No		Date of transfer + 6 years	
1.3.49	Transfer of land to the Academy Trust	No		Life of land ownership then transfer to new owner	
1.3.50	Transfers of freehold land	No		Life of land ownership then transfer to new owner	
	School Fund				
1.3.51	School Fund – Cheque books	No		Current year + 6 years	
1.3.52	School Fund – Paying in books	No			
1.3.53	School Fund – Ledger	No			
1.3.54	School Fund - Invoices	No			
1.3.55	School Fund – Receipts	No			
1.3.56	School Fund – Bank Statements	No			
1.3.57	School Fund – Journey books	No			

	School Meals				
1.3.58	Free school meals registers	Yes		Current year + 6 years	Secure disposal
1.3.59	School meals registers	Yes		Current year + 3years	
1.3.60	School meals summary sheets	No		Current year + 3 years	

1.4 Policies, Frameworks and Overarching Requirements

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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			
1.4.3	Information Security Breach Policy	No			
1.4.4	Special Educational Needs Policy	No			
1.4.5	Complaint's policy	No			
1.4.6	Risk and Control Framework	No		Life of framework + 6 years	
1.4.7	Rules and Bylaws	No		Date rules of bylaws superseded + 6 years	
1.4.8	Home School Agreements	No		Date agreement revised + 6 years	
1.4.9	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	

2.1 Recruitment					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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 interview appointment of a possible new member of staff – unsuccessful candidates	Yes		Date of interview/application of unsuccessful candidate + 6 months	
2.1.3	All records leading up to the appointment of a new member of staff – successful candidates	Yes		All relevant information should be added to the Staff Personal File and all other information retained for 6 months	
2.1.4	Pre-employment vetting information – DBS Checks	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 2.1.5 added to the Staff Personal File	
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	
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	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	
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	

2.1.8	Records relating to the TUPE process	Yes		Date last member of staff transfers of leaves the organisation + 6 years	Secure disposal
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2.2 Operational Staff Management

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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	
2.2.3	Annual appraisal/assessment records	Yes		Current year + 5 years	
2.2.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	
2.2.5	Training needs analysis	No		Current year + 1 year	

2.3 Management of Disciplinary and Grievance Processes

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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	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 persons normal retirement age or 10 years from the date of the allegation whichever is longer, the review	Secure disposal
2.3.2	Disciplinary proceedings	Yes			
	<input type="checkbox"/> Oral warning			Date of warning + 6 months	Secure disposal
	<input type="checkbox"/> Written warning – level 1			Date of warning + 6 months	Secure disposal
	<input type="checkbox"/> Written warning – level 2			Date of warning + 6 months	Secure disposal
	<input type="checkbox"/> Final warning			Date of warning + 6 months	Secure disposal
	<input type="checkbox"/> Case not found			If the incident is child protection related, then see above; otherwise dispose of at the conclusion of the case	Secure disposal

2.4 Health and Safety

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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	

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	
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	
	<input type="checkbox"/> Adults			Date of incident + 6 years	Secure disposal
	<input type="checkbox"/> Children			Date of birth of the child + 25 years	
2.4.5	Control of Substances Hazardous to Health (COSHH)	No		Current year + 10 years then review	
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	
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	
2.4.8	Fire precautions logbooks	No		Current year + 6 years	
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	

3.1 Admissions

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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		Date of admission + 1 year	
3.1.3	Admissions – if the appeal is unsuccessful	Yes		Resolution of case + 1 year	
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	Review Schools may wish to consider keeping the admission register permanently, as often schools receive enquiries from past pupils to confirm the dates they attended the school
3.1.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	Secure disposal
3.1.6	Proof 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	
3.1.7	Supplementary information form, including additional information such as religion and medical conditions	Yes			
	<input type="checkbox"/> For successful admissions			This information should be added to the pupil file	Secure disposal

<input type="checkbox"/> For unsuccessful admissions			Until appeals process is completed	
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3.2 Head Teacher and Senior Management Team

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
3.2.1	Logbooks of activity in the school maintained by the Head Teacher	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
3.2.2	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then review	Secure disposal
3.2.3	Reports created by the Head Teacher of the Management Team	There may be data issues if the report refers to individual pupils of members of staff		Current academic year + 6 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			
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	
3.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	

3.3 Operational Administration

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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	
3.3.3	Records relating to the management of software licences	No		Date licence expires + 6 years	
3.3.4	General file series	No		Current year + 5 years then review	
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			Secure disposal
3.3.8	Visitors books and signing in sheets	Yes		Current year + 6 years then review	Secure disposal
3.3.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No			Secure disposal
3.3.10	Email	Yes		2 years then auto deletion	Secure deletion

4.1 Property Management					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
4.1.1	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry	
4.1.2	Plans of property belonging to the school			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 sole	
4.1.3	Leases of property leased by or to the school			Expiry of lease + 6 years	Secure disposal
4.1.4	Records relating to the letting of school premises			Current financial year + 6 years	
4.1.5	Business continuity and disaster recovery plans			Date the plan superseded + 3 years	

4.2 Maintenance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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 logbooks				

4.3 Fleet Management					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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	No	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	Secure disposal
4.3.2	The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, maintenance			Disposal of the vehicle + 6 years	
4.3.3	Service logs and vehicle logs			Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	
4.3.4	GPS tracking data relating to the vehicles			Date of journey + 6 years	

5.1 Pupil's Educational Records					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
5.1.1	Pupils educational Records required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2003 SI 2005 No. 1437		
	<input type="checkbox"/> Primary	No		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"> <input type="checkbox"/> To another primary school <input type="checkbox"/> To a secondary school

					<input type="checkbox"/> To a pupil referral unit If the pupil dies whilst at primary school, the file should be returned to the LA 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 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
	<input type="checkbox"/> Secondary		Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	Secure disposal
5.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	Secure disposal
5.1.3	Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be retained	
5.1.4	Examination results – pupil copies	Yes			
	<input type="checkbox"/> Public	No		This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	<input type="checkbox"/> Internal			This information should be added to the pupil file	
This review took place when the Independent Inquiry on Historical Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the inquiry is completed. This section will then be reviewed again to take into account any recommendations the inquiry might make concerning record retention					

5.1.5	Child protection information held on pupil file	Yes	<p>“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”</p>	if any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope 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	Yes		Date of birth of the child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	

5.2 Attendance

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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	
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5.3 Special Educational Needs

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
5.3.1	Special Education Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	Review Note: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time in order to defend themselves in a “failure to provide a sufficient education” case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period – this should be documented
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years (This would normally be retained on the pupil file)	Secure disposal unless the document is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs		Special Educational Needs and Disability Act 2001 Section 2		
5.3.4	Accessibility strategy		Special Educational Needs and Disability Act 2001 Section 14		

6.1 Statistics and Management Information

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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 (school copy)	Yes		Current year + 6 years	Secure disposal
	SATs records -	Yes			
	<input type="checkbox"/> 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
	<input type="checkbox"/> Examination papers			The examination papers should be kept until any appeals/validation process is complete	
6.1.3	Published Admission Number (PAN)	Yes		Current year + 6 years	Secure disposal
6.1.4	Value added and contextual data	Yes			
6.1.5	Self-evaluation forms	Yes			

6.2 Implementation of Curriculum

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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 further retention period, or secure disposal.
6.2.2	Timetable				
6.2.3	Class record books				
6.2.4	Mark books				
6.2.5	Records of homework set				
6.2.6	Pupils' work			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

7.1 Educational Visits outside the classroom

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

			Systems” and Section 4 – “Good Practice”		
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 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 from issued by the school for this period of time
7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	
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	Action at end of administrative life of the record
7.2.1	Walking bus registers	Yes		Date of register + 3 years. This takes into account the fact that, if there is an incident requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for accident reporting	Secure disposal (if these records are retained electronically any back-up copies should be destroyed at the same time)

8.1 Local Authority					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
8.1.1	Secondary transfer sheets (Primary)	Yes		Current year + 2 years	Secure disposal
8.1.2	Attendance returns	Yes		Current year + 1 year	
8.1.3	School census returns	No		Current year + 5 years	

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