

# DATA RETENTION POLICY

## 1. Introduction

This policy applies to all employees, workers and contractors.

The Governing Body of Crosshall Infant School Academy Trust are committed to retaining personal data (which may be held on paper, electronically, or otherwise) about our employees for no longer than necessary for the purpose or purposes for which they were collected. All steps will be reasonably taken to securely destroy or erase from systems, all data which is no longer required.

The Governing Body recognise the need to process data in an appropriate and lawful manner, in accordance with The Data Protection Act 2018 which is the UK's implementation of the General Data Protection Regulation (GDPR). The purpose of this policy is to set out the principles by which we will retain your personal data.

Data users are obliged to comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary action, including dismissal.

The Headteacher is responsible for ensuring compliance with the UK GDPR and this policy. Any questions about the operation of this policy or concerns that there has been a breach of this policy should be referred in the first instance to the Office Manager.

## 2. Responsibilities

The Governing Body understand their legal responsibility to comply with the law, including the General Data Protection Regulation. The individual with overall responsibility for this policy is the Data Protection Officer.

## 3. Retention of Data

The Governing Body will state the purposes for which it holds personal information, and will register with the Data Protection Commissioner all the purposes for which it processes personal data.

Personal data will be retained for employment purposes, to assist in the running of the business and/or to enable individuals to be paid. In such cases we will apply the 'recommended' retention period. Some personal data is retained for statutory purposes, in which case we will apply the 'statutory' retention period.

The Governing Body commits to retaining the minimum amount of personal data that is necessary for the purpose for which it is held and access to the personal data will be restricted so that it is used only for the specific purpose.

Personal data will be held as indicated in Appendix 1 and for no longer than the period specified below. All personal data will be destroyed securely at the end of the retention period.

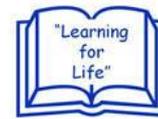
**Approved:** June 2025

**Next Review Due:** June 2026

## Appendix A: Retention of Personal Data

This schedule lists the principal documents held on an employee's file. The list is not exhaustive, and other documents relating to employment may be also held. Personnel files will be held for the length of employment + 6 years at which time they will be securely shredded. Documents relating to child protection or accidents at work may be held for a period of up to 25 years, in accordance with the DFE "Data protection: a toolkit for schools" and the employee will be advised of this.

Document	Period of Retention
<b>Application Process</b>	
Application forms and interview notes (for unsuccessful candidates)	Six months. <i>Recommended.</i>
Original job application form for successful candidate	Termination + 6 years <i>Recommended</i>
<b>Documents Relating to Appointment Process</b>	
Confirmation of pre-employment medical check clearance	Termination + 6 years <i>Recommended</i>
DBS certificates/copies	No requirement to retain <i>Recommended</i>  If retained, maximum period six months and if, in very exceptional circumstances, it is considered necessary to retain a copy of the original certificate for longer than six months, consent should be sought from the applicant and retained on file.



Confirmation of DBS outcome and any associated docs (e.g. risk assessment or certificate of good conduct)	Termination + 25 years <i>Recommended within the DFE guidance, '<u>Data Protection: a toolkit for schools</u>', February 2023</i>
Barred list clearance	Termination + 25 years <i>Recommended within the DFE guidance, '<u>Data Protection: a toolkit for schools</u>', February 2023</i>
Prohibition check	Termination + 25 years <i>Recommended within the DFE guidance, '<u>Data Protection: a toolkit for schools</u>', February 2023</i>
Copies of documents used for identity authentication for DBS and Asylum and Immigration Act purposes	Termination + 2 years <i>Recommended within Home Office '<u>An Employers Guide to Right to Work Checks</u>', March 2023</i>
UK Border Agency Documentation (Work permit)	Termination + 2 years <i>Recommended within Home Office '<u>An Employers Guide to Right to Work Checks</u>', March 2023</i>
Records relating to employees from outside of the UK e.g. visa, work permits, etc.	Termination + 2 years <i>Recommended within Home Office '<u>An Employers Guide to Right to Work Checks</u>', March 2023</i>



Copies of qualifications certificates relevant to employment	Termination + 6 years <i>Recommended</i>
NQT - Satisfactory completion of skills tests.	Termination + 6 years <i>Recommended</i>
Two original references	Termination + 6 years <i>Recommended</i>
Original contract acceptance	Termination + 6 years <i>Recommended</i>
Copy of Contract of employment and any variation letters or side letters	Termination + 6 years <i>Recommended</i>
<b>Disciplinary Records</b>	
Formal disciplinary warnings - child protection related	Termination + 25 years <i>Recommended</i> within the DFE guidance, ' <u>Data Protection: a toolkit for schools</u> ', February 2023
Formal disciplinary warnings - not child protection related	Termination + 6 years <i>Recommended.</i>
<b>Accidents at Work</b>	
Accident books, accident records, accident reports	Three years from the date of the last entry

	(or, if the accident involves a child/ young adult, then until that person reaches age 21) <i>Statutory</i>
Records relating to accident/injury at work	Termination + 12 years <i>Recommended</i>  In the case of serious accidents a further retention period may need to be considered
<b>Financial Information</b>	
Inland Revenue/HMRC correspondence	Termination + 6 years <i>Statutory</i>
National minimum wage records	Three years after the end of the pay reference period following the one that the records cover.  <i>Statutory</i>
Wage/salary records (also overtime, bonuses, expenses)	Termination + 6 years <i>Statutory</i>
Time sheets	Current year + 6 years <i>Recommended</i>
<b>Sickness and Maternity Information</b>	
Medical certificates/ Occupational Health reports and sickness absence record	Current year + 6 years <i>Recommended</i>

SMP, SAP, SSPP records, calculations, certificates (Mat B1s) or other medical evidence, notifications, declarations and notices	Three years after the end of the tax year in which the leave period ends  <i>Statutory</i>
Statutory Sick Pay records, calculations, certificates, self-certificates	Six years after the employment ceases  <i>Recommended</i>
Parental leave records	Eighteen years from birth/adoption of the child or if the child receives a disability living allowance  <i>Recommended</i>
Other special leave of absence including parental leave, maternity leave	Current year + 6 years  <i>Recommended</i>
<b>Leavers Information</b>	
Letter of resignation and acceptance of resignation or other documentation relating to the termination of employment.	Termination + 7 years  <i>Recommended</i>
Exit interview notes	Termination + 7 years  <i>Recommended</i>
Redundancy details, calculations of payments, refunds, notification to the Secretary of State	Six years from the date of redundancy  <i>Recommended</i>
Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity	Six years from the end of the scheme year in which the event took place



	<i>Statutory</i>
<b>Additional Employee Information</b>	
Salary assessment forms - teachers	Current year + 6 years <i>Recommended</i>
Appraisal information	Current year + 6 years <i>Recommended</i>
Staff induction including NQTs Induction	Completion + 6 years <i>Recommended</i> within DFE statutory guidance <u>'Induction for newly qualified teachers (England)'</u> , April 2023
Working time records	Two years from date on which they were made <i>Statutory</i>

## Appendix B

### Governance, Funding and Financial Management of the Academy Trust

1.1 Governance of the Academy Trust					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of the administrative life of the record
1.1.1	<b>Governance Statement</b>	No		Life of governance statement + 6 years	SECURE DISPOSAL
1.1.2	<b>Articles of Association</b>	No		Life of the Academy	
1.1.3	<b>Memorandum of Association</b>	No		This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL
1.1.4	<b>Memorandum of Understanding of Shared Governance among Schools</b>	No	Companies Act 2006 section 355	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL
1.1.5	<b>Constitution</b>	No		Life of the Academy	
1.1.6	<b>Special Resolutions to amend the Constitution</b>	No		Life of the Academy	
1.1.7	<b>Written Scheme of Delegation</b>	No	Companies Act 2006 section 355	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	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL
1.1.12	Annual Report and Accounts	No	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL
1.1.13	Annual Return	No	Companies Act 2006 section 355	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	<b>Appointment and removal of Members</b>	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.17	<b>Strategic Review</b>	No		Date of the review + 6 years	SECURE DISPOSAL
1.1.18	<b>Strategic Plan [also known as School Development Plans]</b>	No		Life of plan + 6 years	SECURE DISPOSAL
1.1.19	<b>Accessibility Plan</b>	No	Limitation Act 1980 (Section 2)	Life of plan + 6 years	SECURE DISPOSAL

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

	Basic file description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of the administrative life of the record
<b>Board of Directors</b>					
1.2.1	<b>Board Meeting Minutes</b>	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES

1.2.2	<b>Board Decisions</b>	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.3	<b>Board Meeting: Annual Schedule of Business</b>	No		Current year	SECURE DISPOSAL
1.2.4	<b>Board Meeting: Procedures for conduct of meeting</b>	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	SECURE DISPOSAL
<b>Committees</b>					
1.2.5	<b>Minutes relating to any committees set up by the Board of Directors</b>	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
<b>General Members' Meeting</b>					
1.2.6	<b>Records relating to the management of General Members' Meetings</b>	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	<b>Records relating to the management of the Annual General Meeting</b>	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
<b>Governors</b>					
1.2.8	<b>Agendas for Governing Body meetings</b>	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	<b>Minutes of, and papers considered at, meetings of the Governing Body and its committees</b>	May be data protection issues, if the meeting is dealing with confidential issues relating to staff			

<b>Principal Set (signed)</b>				Life of Academy	
<b>Inspection copies</b>				Date of meeting + 3 years	SECURE DISPOSAL
1.2.10	<b>Reports presented to the Governing Body</b>	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	<b>Meeting papers relating to the annual parents' meeting held under Section 33 of the Education Act 2002</b>	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
1.2.12	<b>Trusts and Endowments managed by the Governing Body</b>	No		PERMANENT	
1.2.13	<b>Records relating to complaints dealt with by the Governing Body</b>	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	<b>Annual Reports created under the requirements of the</b>	No		Date of report + 10 years	SECURE DISPOSAL

	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002				
<b>Statutory Registers (10)</b>					
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]			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.17	Register of Directors' residential addresses		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.18	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.19	Register of members		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.20	Register of secretaries		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.21	Register of Trustees interests			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.22	Declaration of Interests Statements [Governors] [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL

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

1.3.8	Charging and remissions policy	No		Date policy superseded + 3 years	SECURE DISPOSAL
<b>Audit Arrangements</b>					
1.3.9	Audit Committee and appointment of responsible officers	No		Life of the Academy	SECURE DISPOSAL
1.3.10	Independent Auditor' report on regularity	No		Financial report relates to + 6 years	SECURE DISPOSAL
1.3.11	Independent Auditor's report on financial statements	No		Financial report relates to + 6 years	SECURE DISPOSAL
<b>Funding Arrangements</b>					
1.3.12	Funding Agreement with Secretary of State and supplemental funding arrangements	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		Date of last payment of funding + 6 years	SECURE DISPOSAL

1.3.15	<b>Funding Records - Earmarked Annual Grant (EAG)</b>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.16	<b>Funding Records - General Annual Grant (GAG)</b>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.17	<b>Per pupil funding records</b>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.18	<b>Exclusions agreement</b>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.19	<b>Funding records</b>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.20	<b>Gift Aid and Tax Relief</b>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.21	<b>Records relating to loans</b>	No		Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	SECURE DISPOSAL

**Payroll and Pensions**

1.3.22	<b>Maternity pay records</b>	Yes	Statutory Maternity Pay (General) Regulations 1986  (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
1.3.23	<b>Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995</b>	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	
1.3.24	<b>Management of the Teachers' Pension Scheme</b>	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.25	<b>Records relating to pension registrations</b>	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.26	<b>Payroll records</b>	Yes		Date of payroll run + 6 years	SECURE DISPOSAL

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	SECURE DISPOSAL
1.3.29	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL
Endowment Funds and Investments					
1.3.30	Investment policies	No		Life of the investment + 6 years	SECURE DISPOSAL
1.3.31	Management of Endowment Funds	No		Life of the fund + 6 years	SECURE DISPOSAL
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			Date of the last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
1.3.34	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL

1.3.35	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL
1.3.36	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.37	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.38	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL
<b>Contract Management</b>					
1.3.39	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
1.3.40	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
1.3.41	Records relating the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL

Asset Management					
1.3.42	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
1.3.43	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL
1.3.44	Records relating to the leasing of shared facilities, such as sports centres	No		Current year + 6 years	SECURE DISPOSAL
1.3.45	Land and building valuations	No		Date valuation superseded + 6 years	SECURE DISPOSAL
1.3.46	Disposal of assets	No		Date asset disposed of + 6 years	SECURE DISPOSAL
1.3.47	Community School leases for land	No		Date lease expires + 6 years	SECURE DISPOSAL
1.3.48	Commercial transfer arrangements	No		Date of transfer + 6 years	SECURE DISPOSAL
1.3.49	Transfer of land to the Academy Trust	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL

1.3.50	Transfers of freehold land	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL
<b>School Fund</b>					
1.3.51	School Fund - Cheque books	No		Current year + 6 years	SECURE DISPOSAL
1.3.52	School Fund - Paying in books	No		Current year + 6 years	SECURE DISPOSAL
1.3.53	School Fund - Ledger	No		Current year + 6 years	SECURE DISPOSAL
1.3.54	School Fund - Invoices	No		Current year + 6 years	SECURE DISPOSAL
1.3.55	School Fund - Receipts	No		Current year + 6 years	SECURE DISPOSAL
1.3.56	School Fund - Bank Statements	No		Current year + 6 years	SECURE DISPOSAL
1.3.57	School Fund - Journey books	No		Current year + 6 years	SECURE DISPOSAL
<b>School Meals</b>					
1.3.58	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
1.3.59	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.60	School meals summary sheets	No		Current year + 3 years	SECURE DISPOSAL

As a charity, an Academy is not permitted to trade and make a profit. It is, however, possible to set up a subsidiary trading company, which can sell products or services and Gift Aid profits back to the Academy. If the Academy operates a subsidiary company, it is expected that these records will be managed in line with standard business practice.

<b>1.4 Policies, Frameworks and Overarching Requirements</b>					
	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
1.4.1	<b>Data Protection Policy, including data protection notification</b>	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.2	<b>Freedom of Information Policy</b>	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.3	<b>Information Security Breach Policy</b>	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.4	<b>Special Educational Needs Policy</b>	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.5	<b>Complaints Policy</b>	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.6	<b>Risk and Control Framework</b>	No		Life of framework + ^ years	SECURE DISPOSAL

1.4.7	Rules and Bylaws	No		Date rules or bylaws superseded + 6 years	SECURE DISPOSAL
1.4.9	Home School Agreements	No		Date agreement revised + 6 years	SECURE DISPOSAL
1.4.10	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	SECURE DISPOSAL

#### Human Resources

2.1 Recruitment (17)					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff - unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL

2.1.3	All records leading up to the appointment of a new member of staff - successful candidate	Yes		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL
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 added to the Staff Personal File	SECURE DISPOSAL
2.1.5	Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure	Yes		Where possible, these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File	SECURE DISPOSAL
2.1.6	Pre-employment vetting information - Evidence proving the right to work in the United Kingdom	Yes		Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home	SECURE DISPOSAL

				Office requires that the documents are kept for termination of employment plus not less than 2 years	
2.1.7	<b>Records relating to the employment of overseas teachers</b>	Yes		Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.8	<b>Records relating to the TUPE process</b>	Yes		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL

## 2.2 Operational Staff Management

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

2.3 Management of Disciplinary and Grievance Processes					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention period [Operational]	Action at the end of the 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 person's normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	SECURE DISPOSAL  These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			SECURE DISPOSAL
	<ul style="list-style-type: none"> <li>Oral warning - level 1</li> </ul>	Yes		Date of warning + 6 months	SECURE DISPOSAL
	<ul style="list-style-type: none"> <li>Written warning - level 1</li> </ul>	Yes		Date of warning + 6 months	SECURE DISPOSAL
	<ul style="list-style-type: none"> <li>Written warning - level 2</li> </ul>	Yes		Date of warning + 12 months	SECURE DISPOSAL

	<ul style="list-style-type: none"> <li><b>Final warning</b></li> </ul>	Yes		Date of warning + 18 months	SECURE DISPOSAL
	<ul style="list-style-type: none"> <li><b>Case not found</b></li> </ul>			If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL

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

2.4.4	<b>Accident reporting</b>	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	SECURE DISPOSAL
	• <b>Adults</b>			Date of incident + 6 years	SECURE DISPOSAL
	• <b>Children</b>			Date of birth of the child + 25 years	SECURE DISPOSAL
2.4.5	<b>Control of Substances Hazardous to Health (COSHH)</b>	No		Current year + 10 years then REVIEW	SECURE DISPOSAL
2.4.6	<b>Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos</b>	No		Last action + 40 years	SECURE DISPOSAL
2.4.7	<b>Process of monitoring of areas where employees and persons are likely to have come into contact with radiation</b>	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	<b>Fire precautions log books</b>	No		Current year + 6 years	SECURE DISPOSAL

2.4.9	Fire risk assessments	No	Fire Service Order 2005	Life of the risk assessment + 6 years	SECURE DISPOSAL
2.4.10	Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL

### Management of the Academy

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

			bodies, local authorities, schools' adjudicators and admission appeals panels December 2014		
<b>3.1.3</b>	<b>Admissions - if the appeal is unsuccessful</b>	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
<b>3.1.4</b>	<b>Register of admissions</b>	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
<b>3.1.5</b>	<b>Admissions - Secondary Schools - Casual</b>	Yes		Current year + 1 year	SECURE DISPOSAL

3.1.6	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL
3.1.7	Supplementary information form, including additional information such as religion and medical conditions	Yes			SECURE DISPOSAL
	<ul style="list-style-type: none"> <li>• <b>For successful admissions</b></li> </ul>			This information should be added to the pupil file	SECURE DISPOSAL
	<ul style="list-style-type: none"> <li>• <b>For unsuccessful admissions</b></li> </ul>			Until appeals process completed	SECURE DISPOSAL

### 3.2 Headteacher and Senior Management Team

	Basic file description	Data Protection Issues	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record
3.2.1	Log books of activity in the school maintained by the Headteacher	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then REVIEW	SECURE DISPOSAL
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 Headteacher or the Management Team	There may be data protection issues if the report refers to individual pupils		Date of the report + a minimum of 3 years then REVIEW	SECURE DISPOSAL

		or members of staff			
3.2.4	<b>Records created by Headteachers, Deputy Headteachers, heads of year and other members of staff with administrative responsibilities</b>	There may be data protection issues if the records refers to individual pupils or members of staff		Current academic year + 6 years then REVIEW	SECURE DISPOSAL
3.2.5	<b>Correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities</b>	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL
3.2.6	<b>Professional Development Plans</b>	Yes		Life of the plan + 6 years	SECURE DISPOSAL

<b>3.3 Operational Administration</b>					
	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>
3.3.1	<b>Management of complaints</b>	Yes		Date complaint resolved + 3 years	SECURE DISPOSAL
3.3.2	<b>Records relating to the management of contracts with external providers</b>	No		Date of last payment on contract + 6 years	SECURE DISPOSAL
3.3.3	<b>Records relating to the management of software licences</b>	No		Date licence expires + 6 years	SECURE DISPOSAL
3.3.4	<b>General file series</b>	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
3.3.5	<b>Records relating to the creation and publication of the school brochure or prospectus</b>	No		Current year + 3 years	STANDARD DISPOSAL
3.3.6	<b>Records relating to the creation and distribution of circulars to staff, parents or pupils</b>	No		Current year + 1 year	STANDARD DISPOSAL

3.3.7	Newsletters and other items with a short operational use	No		Current year + 1 year	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		Current year + 6 years then REVIEW	SECURE DISPOSAL

### Property Management

This section covers the management of buildings and property.

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

4.1.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold	
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
4.1.5	Business continuity and disaster recovery plans	No		Date the plan superseded + 3 years	SECURE DISPOSAL

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

4.2.2	All records relating to the maintenance of the school carried out by school employees, including maintenance log books	No		Current year + 6 years	SECURE DISPOSAL
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### Pupil / Student 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 (page....)

5.1 Pupil's Educational Record					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	<ul style="list-style-type: none"> <li>Primary</li> </ul>			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"> <li>To another primary school</li> <li>To a secondary school</li> <li>To a pupil referral unit</li> </ul> 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
	<ul style="list-style-type: none"> <li><b>Secondary</b></li> </ul>		Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	SECURE DISPOSAL
5.1.2	<b>Records relating to the management of exclusions</b>	Yes		Date of birth of the pupil involved + 25 years	SECURE DISPOSAL

5.1.3	Management of examination registrations	Yes			
5.1.4	Examination results - pupil copies	Yes			
	<ul style="list-style-type: none"> <li>Public</li> </ul>			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	<ul style="list-style-type: none"> <li>Internal</li> </ul>			This information should be added to the pupil file	
<p>This review took place when the Independent Inquiry on Historical Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention</p>					
5.1.5	Child protection information held on pupil file	Yes	"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"	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	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	SECURE DISPOSAL - these records MUST be shredded
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Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule.

5.2 Attendance					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record
5.2.1	<b>Attendance registers</b>	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	SECURE DISPOSAL

5.2.2	Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL
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5.3 Special Educational Needs					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 30 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 + 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	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 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	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	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

### Curriculum Management

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

<b>SATS records</b>		Yes			
	<ul style="list-style-type: none"> <li><b>Results</b></li> </ul>			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
	<ul style="list-style-type: none"> <li><b>Examination papers</b></li> </ul>			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
6.1.3	<b>Published Admission Number (PAN) reports</b>	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	<b>Value added and contextual data</b>	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	<b>Self-evaluation forms</b>	Yes		Current year + 6 years	SECURE DISPOSAL

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

					further retention period, or, SECURE DISPOSAL
6.2.5	Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.6	Pupils' work	No		Where possible, work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year	SECURE DISPOSAL

### Extracurricular Activities

7.1 Educational Visits outside the Classroom					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention period [Operational]	Action at the end of the 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	Date of visit + 14 years	SECURE DISPOSAL

			<p>website <a href="http://oeapng.info">http://oeapng.info</a></p> <p>specifically, Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".</p>		
7.1.2	Records created by schools in order to obtain approval to run an educational visit outside the classroom - Secondary schools	No	<p>Outdoor Education Advisers' Panel National Guidance website <a href="http://oeapng.info">http://oeapng.info</a></p> <p>specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".</p>	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 date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single

					consent form issued by the school for this period of time
7.1.4	Parental permission slips for school trips - where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	
7.1.5	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	