

Policy A18 Document Retention

1. Aims

- 1.1 The University of Brighton Academies Trust recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the Trust.
- 1.2 Records provide evidence for protecting the legal rights and interests of the Trust, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

2. Scope of the policy

- 2.1 This policy applies to all records created, received or maintained by Trust staff in the course of carrying out its functions.
- 2.2 Records are defined as all those documents which facilitate the business carried out by the Trust and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.
- 2.3 A small percentage of the Trust's records will be selected for permanent preservation as part of the Trust archives.

3. Responsibilities

- 3.1 The Trust has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Trust Data Protection Officer.
- 3.2 Each academy and Professional Services Department will nominate a person to be responsible for records management who will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- 3.3 Each academy and Professional Services Department will manage and document its records disposal process in line with the Records Retention Schedule. This will help to ensure that the Trust can meet Freedom of Information requests and respond to requests to access personal data under data protection legislation (subject access requests "SARS").
- 3.4 Individual staff and employees must ensure, with respect to records for which they are responsible, that they:
 - Manage records consistently in accordance with policies and procedures;
 - Properly document their actions and decisions;
 - Hold personal information securely;
 - Only share personal information appropriately and do not disclose it to any unauthorised third party;
 - Dispose of records securely in accordance with the Records Retention Schedule.

4. Links with other policies

This policy is linked to our:

- Data Protection policy
- Academy Safeguarding and Child Protection policy

- Freedom of information publication scheme
- ICT acceptable use policy (Staff and Pupils/Students)
- Social Media policy
- Photography and image sharing

5. Policy status and review

Written by:	Head of Governance and Admissions
Owner:	Data Protection Officer
Status:	Approved
Approval date:	7 December 2020
Review Date:	Annually

Governance, Funding and Financial Management of the Academy Trust

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of document
1.1	Governance of the Academy Trust				
1.1.1	Governance statement	No		Life of governance statement + 6 Years	SECURE DISPOSAL
1.1.2	Articles of Association	No		Life of the Trust	SECURE DISPOSAL
1.1.3	Memorandum of Association	No		This can be disposed of once the Trust has been incorporated	SECURE DISPOSAL
1.1.4	Memorandum of Understanding of Shared Governance among schools	No	Companies Act 2006 section 355	Life of memorandum of understanding + 6 years	SECURE DISPOSAL
1.1.5	Constitution	No		Life of the Trust	
1.1.6	Special resolutions to amend the Constitution	No		Life of the Trust	
1.1.7	Written Scheme of Delegation	No	Companies Act 2006 section 355	Life of written Scheme of Delegation +10 years	SECURE DISPOSAL
1.1.8	Trustees – appointment	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.9	Trustees – disqualification	No	Company Directors Disqualification Act 1986	Date of disqualification + 15 years	SECURE DISPOSAL
1.1.10	Trustees – 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	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	No		Life of plan + 6 years	SECURE DISPOSAL
1.1.19	Academy accessibility plan	There may be if the plan refers to specific pupils	Limitation Act 1980 (Section 2)	Life of plan + 6 years	SECURE DISPOSAL
1.2	Board of Trustees				
1.2.1	Board meeting minutes	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	offer to archives
1.2.2	Board decisions	Could be if the decisions refer to living individuals		Date of the meeting + a minimum of 10 years	offer to archives
1.2.3	Board meeting:annual schedule of business	No		Current year	SECURE DISPOSAL
1.2.4	Board meeting: procedures for conduct of meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	SECURE DISPOSAL
	Committees				
1.2.5	Minutes relating to any committees set up by the Board of Trustees	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	offer to archives
1.2.6	Agendas for Board of Trustees and Committee meetings including Local Boards	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the signed set of minutes permanently. All other copies can be disposed of.	SECURE DISPOSAL
1.2.7	Minutes of Board of Trustees and Committee meetings including Local Boards	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		The signed set of minutes should be retained permanently together with a copy of the final agenda.	

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1.2.8	Reports/papers for Board of Trustees and Committee meetings including Local Boards	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 minutes
1.2.9	Records relating to complaints dealt with by the Governing Body (Board of Trustees or Local 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
	Members				
1.2.10	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
1.2.11	Records relating to the management of the Annual General meeting	Could be if the minutes refer to living individuals	Companies Act 2006 Section 248	Minutes must be kept for at least 10 years from the date of the meeting	offer to archives
	Statutory registers				
1.2.12	Register of Trustees		Companies Act 2006	Life of the Trust + 6 years	SECURE DISPOSAL
1.2.13	Declaration of interests			Life of the Trust + 6 years	SECURE DISPOSAL
1.3	Funding and finance				
	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		Current financial year + 6 years	SECURE DISPOSAL
1.3.3.	Value for money statement	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.4	Records relating to the management of VAT	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.5	Whole of government accounts returns	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.6	Borrowing powers	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.7	Budget plan	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.8	Charging and remissions policy	No		Date policy superseded + 3 years	SECURE DISPOSAL
	Audit arrangements				
1.3.9	Audit Committee and appointment of responsible officers	No		Life of the Trust	SECURE DISPOSAL
1.3.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	SECURE DISPOSAL
1.3.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	SECURE DISPOSAL
	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		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.15	Funding records - Earmarked annual grant (EAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.16	Funding records - General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.17	Per pupil funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.18	Exclusions agreements	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.19	Funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.20	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	SECURE DISPOSAL

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1.3.21	Records relating to loans	No		Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	SECURE DISPOSAL
	Payroll and pensions				
1.3.22	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960) revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
1.3.23	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)	From the end of the year in which the accounts were signed for a minimum of 6 years	SECURE DISPOSAL
1.3.24	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.25	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.26	Payroll records	Yes		Date payroll run + 6 years	SECURE DISPOSAL
	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	
	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	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
	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	SECURE DISPOSAL
1.3.41	Records relating to 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

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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 buildings 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
	School meals				
1.3.51	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
1.3.52	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.53	School meals registers	No		Current year + 3 years	SECURE DISPOSAL
1.4	Policies, Frameworks and Overarching Requirements				
1.4.1	Data Protection policy, including data protection notification	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.2	Freedom of Information policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.3	Information security breach policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.4	Special Educational Needs policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.5	Complaints policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.6	Risk and control framework	No		Life of framework + 6 years	SECURE DISPOSAL
1.4.7	Rules and byelaws	No		Date rules or byelaws superseded + 6 years	SECURE DISPOSAL
1.4.8	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

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of document
2.1	Recruitment				
2.1.1	All records leading up to the appointment of a new Principal	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 + 1 year	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	DBS Update Service Employer Guide June 2014	The Trust/academy 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 placed on the personal file of the individual	SECURE DISPOSAL
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 [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	SECURE DISPOSAL
2.1.7	Records relating to the employment of overseas teachers	Yes		Where possible these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.8	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6years	SECURE DISPOSAL
2.2	Operational staff management				
2.2.1	Staff Personal File	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
2.2.6	Staff photographs for identification purposes	Yes		Termination of employment	SECURE DISPOSAL
2.2.7	National minimum wage records	Yes	National minimum wage act 1998	3 years after the end of the pay reference period following the one that the records cover	SECURE DISPOSAL
2.2.8	Retirement Benefits Schemes – records of notifiable events, for example, relating to	Yes	The Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)	6 years from the end of the scheme year in which the event took place	SECURE DISPOSAL

Human Resources

2.2.9	Statutory Maternity Pay records, calculations, certificates (Mat B1s) or other medical evidence	Yes	The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960) as amended	3 years after the end of the tax year in which the maternity period ends	SECURE DISPOSAL
2.2.10	Wage/salary records (also overtime, bonuses, expenses)	Yes	Taxes Management Act 1970. HMRC records	6 years plus current year	SECURE DISPOSAL
2.2.11	Working time records	Yes	The Working Time Regulations 1998 (SI 1998/1833)	2 years from date on which they were made	SECURE DISPOSAL
2.2.12	Personnel files and training records	Yes		6 years after employment ceases	SECURE DISPOSAL
2.2.13	Redundancy details, calculations of payments, refunds, notification to the Secretary of State	Yes		6 years from the date of redundancy	SECURE DISPOSAL
2.2.14	Statutory Sick Pay records, calculations, certificates, self-certificates	Yes		6 years after employment ceases	SECURE DISPOSAL
2.2.15	Parental leave	yes		18 years from the birth of the child	SECURE DISPOSAL
2.2.16	Trade Union agreements	yes		10 years after ceasing to be effective	SECURE DISPOSAL
2.2.17	Senior executives records	Yes		Permanently for historical purposes	
2.2.18	Pensions – employee records (name, NI no., opt-in notice and joining notice)	Yes	Pension Regulator	6 years	SECURE DISPOSAL
2.2.19	Pension opt out	Yes	Pension Regulator	4 years	SECURE DISPOSAL
2.2.20	Pensions – employer records (scheme name address and reference)	no	Pension Regulator	6 years	SECURE DISPOSAL
2.2.21	Pensions – scheme data	yes	HMRC	6 years after the current year	SECURE DISPOSAL BY PROVIDER. In the event of the contract ending there will be the option of having the data returned for retention/destruction or for the provider to hold for that period (hard or soft copy) and continue to do so and destroy as each year passes
2.3	Management of disciplinary and grievance processes				
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	"Keeping children safe in education Statutory guidance for schools and colleges September 2020"; "Working together to safeguard children. A guide to inter-agency working to safeguard and protect the welfare of children March 2015	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW.	SECURE DISPOSAL
2.3.2	Disciplinary Proceedings	Yes			
	oral warning			Date of warning + 6 months	SECURE DISPOSAL
	written warning – level 1			Date of warning + 6 months	SECURE DISPOSAL
	written warning – level 2			Date of warning + 12 months	SECURE DISPOSAL

Human Resources

	final warning			Date of warning + 18 months	SECURE DISPOSAL
	case not found			If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL

Health and Safety

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of document
2.4.1	Health and Safety Policy Statements	No	Health and Safety at Work Act 1974	Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety Risk Assessments	No	Health and Safety at Work Regulations 1999	Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.3	Records relating to accident/injury at work	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	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	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended, and Limitation Act 1980. Special rules apply concerning incidents involving hazardous substances	General and RIDDOR - Date of Incident + 3 years minimum (RIDDOR can be stored electronically and suggest records kept indefinitely in this format)	SECURE DISPOSAL
	Adults		Health and Safety at Work Act 1974	Date of the incident + 6 years	SECURE DISPOSAL
	Children		Health and Safety at Work Act 1974	DOB of the child + 25 years	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002	There is no specific time scale for the retention of COSHH assessments, the requirement is to keep the record for as long as it is valid (as with other risk assessments). However with regard to maintenance, examination and testing of control measures the ACoP states - Every employer shall keep a suitable record of the examinations and tests carried out in accordance with paras (2) and (3) and of repairs carried out as a result of those examinations and tests, and that record or a summary thereof shall be kept available for at least 5 years from the date it was made	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos Regulations 2012	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	The Ionising Radiations Regulations 2017	Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire Precautions log books	No	The Regulatory Reform (Fire Safety) Order 2005	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	Health and Safety (Display	Current year + 20 years 5 years (up to 40 years if it	SECURE DISPOSAL

Health and Safety

2.4.11	DSE assessments	No	Screen Equipment) Regulations 1992	relates to a potential ill-health claim)	SECURE DISPOSAL
2.4.12	Manual handling assessments, etc. (including their reviews and updates) and details of any actions taken including associated training records	No	Manual Handling Operations Regulations 1992 (as amended)	5 years (up to 40 years if it relates to a potential ill-health claim)	SECURE DISPOSAL
2.4.13	All site maintenance, examination and testing records	No	Health and Safety at Work Act 1974 & Management of Health and Safety at Work Regulations 1999	5 years (up to 40 years if it relates to a potential ill-health claim)	SECURE DISPOSAL
2.4.14	Records of local and site safety inspections, meetings, safety committee records etc	No	Health and Safety at Work Act 1974 & Management of Health and Safety at Work Regulations 1999	5 years (up to 40 years if it relates to a potential ill-health claim)	SECURE DISPOSAL
2.4.15	Associated safety training records	No	Health and Safety at Work Act 1974 & Management of Health and Safety at Work Regulations 1999	5 years (up to 40 years if it relates to a potential ill-health claim)	SECURE DISPOSAL
2.4.16	LEV testing and air sampling	No	Control of Substances Hazardous to Health Regulations 2002 Regulation 9	5 years (up to 40 years if it relates to a potential ill-health claim)	SECURE DISPOSAL
2.4.17	Health surveillance records	Yes	The Management of Health and Safety at Work Regulations 1999	60 years	SECURE DISPOSAL
2.4.18	Medical records and details of biological tests under the Control of Lead at Work Regulations	Yes	The Control of Lead at Work Regulations 2002	40 years from the date of the last entry	SECURE DISPOSAL
2.4.19	Assessments under health and safety regulations and records of consultations with safety representatives and committees	No	The Management of Health and Safety at Work Regulations 1999	Permanently	SECURE DISPOSAL

Management

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of document
3.1	Admissions				
3.1.1	All records relating to the creation and implementation of the Trust Admissions policy	No	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then review	SECURE DISPOSAL
3.1.2	Admissions - if the admission is successful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL
3.1.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
3.1.4	Register of admissions	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made	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	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, 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
3.2	Principal and Senior Leadership Team				
3.2.1	Log books of activity in the academy maintained by the Principal	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate
3.2.2	Minutes of Senior Leadership 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
3.2.3	Reports created by the Principal or the Leadership 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

Management

3.2.4	Records created by Principal, Vice Principals/senior leaders and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then review	SECURE DISPOSAL
3.2.5	Correspondence created by Principals, Vice Principals/senior leaders and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then review	SECURE DISPOSAL
3.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
3.2.7	Academy Development/Improvement Plans	No		Life of the plan + 3 years	SECURE DISPOSAL
3.3	Operational Administration				
3.3.1	Management of complaints	Yes		Date complaint resolved + 3 years	SECURE DISPOSAL
3.3.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	SECURE DISPOSAL
3.3.3	Records relating to the management of software licences	No		Date licence expires + 6 years	SECURE DISPOSAL
3.3.4	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
3.3.5	Records relating to the creation and publication of marketing and communication materials including academy prospectuses.	No		2 years	STANDARD DISPOSAL
3.3.6	Pupil images and staff images for marketing purposes	Yes		2 years	SECURE DISPOSAL
3.3.7	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
3.3.8	Marketing contact lists	Yes		3 years	SECURE DISPOSAL
3.3.9	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
3.3.10	Visitors' Books and Signing in Sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
3.3.11	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL
4	Property management				
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 + 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				

Management

4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	No		Current year + 6 years	SECURE DISPOSAL
4.3	Fleet management				
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 vehicle and when, maintenance	No	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.3	Service logs and vehicle logs	No	Limitation Act 1980 (Section 2)	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	SECURE DISPOSAL
4.3.4	GPS tracking data relating to the vehicles	No	Limitation Act 1980 (Section 2)	Date of journey + 6 years	SECURE DISPOSAL

Pupil Management

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of document
5.1	Pupil's Educational 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		
	Primary			Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school. This will include: <ul style="list-style-type: none"> to another primary school to a secondary school to a pupil referral unit <p>If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period.</p> <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the 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</p>
	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 + 25 years	SECURE DISPOSAL
5.1.3	Management of examination registrations	Yes		The examination board will usually mandate how long these need to be retained	
5.1.4	Examination Results – Pupil Copies	Yes			
	Public		JCQ (Joint Council of Qualifications)	This information should be added to the pupil file. Certificates should be retained for 5 years	SECURE DISPOSAL
	Internal			This information should be added to the pupil file	
Due to the ongoing Independent Inquiry on Child Sexual Abuse, it is currently unlawful for any records relating to child abuse to be destroyed. Please ensure that these are retained until the inquiry has concluded					
5.1.5	Child Protection information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges September 2018"; "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 pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges September 2018"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	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
5.2	Attendance				
5.2.1	Attendance Registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities	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

Curriculum management

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of document
6.1	Statistics and management information				
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination Results (Schools Copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	SATS records –	Yes			
	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.	SECURE DISPOSAL
				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	
	Examination Papers			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value Added and Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL
6.2	Implementation of curriculum				
6.2.1	Schemes of Work	No		Current year + 1 year	
6.2.2	Timetable	No		Current year + 1 year	
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	
6.2.5	Record of 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

Extracurricular activities

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of document
7.1	Educational visits outside the classroom				
7.1.1	Records created by schools 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 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 Systems" and Section 4 - "Good Practice".	Date of visit + 10 years	SECURE DISPOSAL
7.1.3	Parental consent forms for school trips where there has been no major incident	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	Limitation Act 1980 (Section 2)	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				
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	

Central government and Local Authority

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of document
8.1	Local Authority				
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
8.2	Central Government				
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

ICT

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Location
9.1	Backup – all critical data at academy level	Yes		90 days after user leaves	Local network
9.2	Backups- Office 365 data, Teams, Sharepoint, Onedrive	Yes		90 days after user leaves	Office 365
9.3	User data - Office 365	Yes		90 days after user leaves	Office 365
9.4	User Home Data - at academy level	Yes		90 days after user leaves	Local network
9.5	Jira Helpdesk - accounts	Yes		90 days after user leaves	THA/Azure
9.6	Helpdesk - jobs/stats	Yes		4 years	THA/Azure
9.7	Web filtering data/logs	Yes		1 year	Local Network