



Twyford
CofE
Academies Trust

Document Title	Data and Document Retention Policy
Committee Responsible for Policy	Resources Committee
Review Frequency	Every 3 years
Last Reviewed	November 2020 (updated March 2022)
Next Review Due	November 2023
Policy Author	Director of Finance & Operations

Assessment of the Impact of a Policy on Equality & Diversity

Policy: Data and Document Retention Policy	
Impact assessed by: R Lane	Date: 18/3/2022
1. What is the potential for this policy impacting a person or group with a protected characteristic differently (favourably or unfavourably) from everyone else? Personal data of staff or pupils from protected groups may be unnecessarily retained for longer than personal data of staff or pupils in general.	
2. How would this be evidenced? By reviewing old/archived personal data.	
3. Is there evidence that the operation of the current policy might impact a person or group with a protected characteristic differently from everyone else? No.	
4. If the answer to 3 is 'Yes', please provide details and evidence. 	
5. How might the new policy change this? 	
6. Are there any other changes to the policy which might impact a group with a protected characteristic differently from everyone else? No.	
7. If the answer to 6 is 'Yes', please provide details and evidence. 	
8. Policies are required to reduce or eliminate inequality and disadvantage and promote diversity. Does this assessment indicate that the Policy passes or fails this test? PASS	

Data and Document Retention Policy

1 Introduction

The 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 school. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited. This policy has been drawn up with reference to a template document produced by the London Diocesan Board for Schools.

2 Scope of the Policy

This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions.

Records are defined as all those documents which facilitate the business carried out by the school 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.

A small percentage of the school's records will be selected for permanent preservation as part of the institution's archives and for historical research. This should be done in liaison with the County Archives Service.

3 Policy Statement

It is the Trust's policy to fully comply with its legal obligations concerning retention of personal data (as prescribed in the Data Protection Act 2018) which requires that personal data should only be retained as long as is required for the purpose it is held.

Documentation relating to financial transactions will be held as long as transactions can be disputed under the statute of limitations (normally 6 years after the date of the transaction or the expiry of the contract). A small percentage of the school's records (not including personal information) may be selected for permanent preservation as part of the institution's archives and for historical research.

4 Responsibilities

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 Executive Headteacher. She delegates responsibility for implementing the policy to the Director of Finance and Operations who gives 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. Individual staff and employees must ensure that records for

which they are responsible are accurate and are maintained and disposed of in accordance with this Document and Data Retention Policy.

5 Relationship with other Policies

This policy should be read in conjunction with the Data Protection and Confidentiality Policy, the Freedom of Information Publication Scheme and the Financial Regulations.

6 What to do with Records that are No Longer Needed

Where records have been identified for destruction they should be disposed of in an appropriate way. All records containing personal information, or confidential policy information should be securely disposed of (see section 7 below).

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

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.

7 Secure Disposal

For paper records, secure disposal means shredding, either on site by means of a crosscut shredder or using the services of a company who provide shredding and disposal of large quantities of paper records. A collection of records for secure disposal should be arranged at least annually and all staff keeping records should be encouraged to take advantage of the service.

For electronic records, secure disposal means deletion of records from primary media and also from backup media. Records held on hosted services should also be deleted and confirmation received that backups have also been deleted.

The Freedom of Information Act 2000 requires disposal/deletions of key records to be logged. The log entry should include a description of the records, the officer authorising the disposal/deletion and the date it took place.

8 The Purpose of Retention Guidelines

The retention schedule lays down the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative use. The retention schedule lays down the basis for normal processing under the Data Protection Act 2018 the Freedom of Information Act 2000 and the General Data Protection Regulation 2016. The retention periods are informed by other legislation such as Education Act 1995, Limitation Act 1990, the Information management toolkit for schools has been consulted for posterity. Members of staff are expected to manage their current record keeping systems using the retention schedule and to take account of the different kinds of retention periods

when they are creating new record keeping systems. The retention schedule refers to record series regardless of the media in which they are stored.

9 Retention Schedule

Details of standard retention periods for different categories of documents and data records are shown in the following tables.

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
1. Management						
1.1. Governance						
1.1.1	Agendas for Governing Body Meetings-Principal Copy	No		Where possible the agenda should be stored with the principal set of the minutes.	Secure Disposal	
1.1.2	Records relating to DBS checks carried out on clerk and the members of the governing body	Yes		Date of DBS check + 6 years	Secure Disposal	
1.1.3	Governor Personal Files	Yes		Date appointment ceases + 6 years	Secure Disposal	
1.1.4	Records relating to the induction program for new governors	No		Date appointment ceases + 6 years	Secure Disposal	
1.1.5	Records relating to the training required and received by Governors	Yes		Date appointment ceases + 6 years	Secure Disposal	
1.1.6	Records Relating to the appointment of a clerk to the governing body	Yes		Date appointment ceases + 6 years	Secure Disposal	
1.1.7	Records Relating to Governor declaration of Disqualification criteria	Yes		Date appointment ceases + 6 years	Secure Disposal	
1.1.8	Register of Business Interests	Yes		Date appointment ceases + 6 years	Secure Disposal	
1.1.9	Records relating to the Election of parent and Staff	Yes		Date of election + 6 months	Secure Disposal	

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
	governors not appointed by the governors					
1.1.10	Record of attendance at full governing Board Meetings	Yes		Date of Meeting + 6 years	Secure Disposal	
1.1.11	Agendas for Governing Body Meetings-Principal Copy	No		Where possible the agenda should be stored with the principal set of the minutes.	Secure Disposal	
1.1.12	Correspondence sent and received by the governing body or head teacher	Yes		Current year + 3 years	Secure Disposal	
1.1.13	Minutes of Governing Body meetings- Principle Set (signed)	Yes		Although generally kept for the life of the organisation the LA is only required to make this available for 10 years from the Date of meeting.	Secure Disposal	
1.1.15	Reports presented to the Governing Body which are referred to in the minutes.	No		Although generally kept for the life of the organisation the LA is only required to make this available for 10 years from the Date of meeting.		
1.1.16	Instruments of Government including Articles of Association	No		Permanent	Retain in school	
1.1.17	Trusts and Endowments managed by the Governing Body	No		Permanent	Retain in school whilst operationally required	

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
1.1.18	Action plans created and administered by the Governing Body	No		Until superseded or whilst relevant	Secure Disposal	
1.1.19	Policy documents created and administered by the Governing Body	No		Until superseded	Retain in school whilst policy is operational	
1.1.20	Records relating to complaints dealt with by the Governing Body	Yes		Major Complaints Date of resolution of complaint + 6 years Complaints involving allegations of Negligence Date of resolution of complaint + 15 years Complaints involving allegations relating to safeguarding or child protection Date of resolution of complaint + 40 years	Retain in school for the first six years Review for further retention in the case of contentious disputes Secure Disposal routine complaints	
1.1.21	Annual Reports required by the Department for Education and Skills	No	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI 2002 No 1171	Date of report + 10 years		
1.1.22	Proposals for schools to become, or be established as Specialist Status schools	No		Current year + 3 years		

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
1.2 Headteacher's/SLT Files/Records						
1.2.1	Logbooks of activity in the school maintained by the Head Teacher	Yes		Date of last entry in the book + a minimum of 6 years then reviews.		
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	Yes		Date of the meeting + 3 years then review.	Secure Disposal	
1.2.3	Reports created by the Head Teacher or the Management Team	Yes		Date of the report + a minimum of 3 years then reviews.	Secure Disposal	
1.2.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		Current academic year + 6 years then review	Secure Disposal	
1.2.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		Date of correspondence + 3 years then review	Secure Disposal	
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	Secure Disposal	

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
1.2.7	School Development Plans	No		Life of the plan + 3 years	Secure Disposal	
1.2.8	School Privacy Notice which is sent to Parents and Pupils	Yes		Until superseded + 6 years		
1.3 Admission Records						
1.3.1	All records relating to the creation and implementation of the School Admissions' Policy	No		Life of the policy + 3 years then review	Secure Disposal	
1.3.2	Admissions – if the admission is successful	Yes		Date of Admission + 1 Year	Secure Disposal	
1.3.3	Admissions – if the appeal is unsuccessful	Yes		Resolution of case + 1 year	Secure Disposal	
1.3.4	Admissions Schools – Casual – if offer is accepted	Yes		Current Year + 1 Year	Secure Disposal	
1.3.5	Admissions – Schools – Casual – if offer is declined	Yes		Retain for 3 months	Secure Disposal	
1.3.6	Proof of address supplied by parents as part of the admissions process	Yes		Current year + 1 year	Secure Disposal	
1.3.7	Supplementary Information form including additional	Yes				
				This information should be added to the pupil file	Secure Disposal	

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
	information such as religion, medical conditions etc. <ul style="list-style-type: none"> • For successful admissions • For unsuccessful admissions 			Until appeals process completed	Secure Disposal	
1.3.8	Register of Admissions	Yes		Every entry must be preserved for 3 years from the point of entry.		
1.4 Operational Administration						
1.4.1	General file series	No		Current year + 5 years then REVIEW	Secure Disposal	
1.4.2	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	Standard Disposal	
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	Standard Disposal	
1.4.4	Newsletters and other items with a short operational use	No		Current year + 1 year	Standard Disposal	
1.4.5	Visitors' Signing in Information: In the both Paper and Electronic Versions	Yes		Current year + 6 years then REVIEW	Secure Disposal	

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
1.4.6	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	
1.4.8	Electronic forms used to attain data from pupils or staff.	Yes		6 months then Review	SECURE DISPOSAL	
1.4.9	Social media Posts:	Yes		Current Year + 2 Years*	SECURE DISPOSAL	
1.4.10	Remote Learning Videos: Hosted on YouTube, Website, Vimeo etc.	Yes		Current Year + 1 Year+	SECURE DISPOSAL	
1.4.11	Video Conferencing Recordings taken for safeguarding reasons.	Yes		Current Year + 5 Years	Secure Disposal or moved to Archive for preservation of history.	
1.4.12	News Archive/Feed if different to Newsletters	Yes		Current Year + 2 Years*	SECURE DISPOSAL	
1.4.13	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	
1.4.14	Emails in Staff Email Accounts	Yes		Recommended: 1. Teachers = 2 Years 2. SLT + Admin = 5-6 years 3. Generic/Shared Accounts e.g. Office@ = 5-6 years 4. Leavers: Delete	SECURE DISPOSAL	
1.4.15	Emails in Pupil Email Accounts:	Yes		Recommended: 1. Pupils = 1 Year	SECURE DISPOSAL	

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
1.4.16	Electronic files kept in Shared Drives.	Yes		Recommended: 1-2 years	SECURE DISPOSAL	
1.4.17	Electronic Files kept in Personal Drives	Yes		Recommended: 1-2 years Leavers: Delete	SECURE DISPOSAL	
1.4.18	Staff Photos (Internal Displays, Visitor Administration System, Website, Social Media)	Yes		Current Staff: Until Updated Leavers: Delete/Destroy	SECURE DISPOSAL	
1.4.19	Pupil Photos (Internal Displays, Visitor Administration System, Website, Social Media)	Yes		Recommend Maximum: Lifetime at school + 3 years. (Dependent on your Consent)	Secure Disposal or moved to Archive for preservation of history.	
1.4.20	School Newsletter: Held on website and on internal systems.	Yes		Current year + 1 Academic Year	Secure Disposal or moved to Archive for preservation of history.	
2 Human Resources						
2.1 Recruitment Records						
2.1.1	All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years	Secure Disposal	
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	Secure Disposal	
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months	Secure Disposal	

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
2.1.4	Pre-employment vetting information – DBS Checks-successful candidates	No	DBS Update Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74	Application forms and references and other documents for the duration of the employee’s employment + 6 years		
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Where possible these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be placed on the member of staff’s personal file		
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ⁴	Yes	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 2 years		
2.2 Staff Management Records						
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 + 6 years	Secure Disposal	

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
2.2.4	Staff Training-where training related to children (e.g. safeguarding or other child related training)	Yes		Date of Training + 40 years		
2.2.5	Staff Training-where training leads to Continuing professional development	Yes		Length of time required by the professional body		
2.2.6	Sickness and Absence Monitoring	Yes		Current Year + 3 Years		
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 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 the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found, they are to be kept on the file and a copy provided to the person concerned	Secure Disposal	
2.3.2	Disciplinary Proceedings	Yes				
	▪ Oral warning	Yes		Date of warning + 6 months	Secure Disposal	

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
	<ul style="list-style-type: none"> Written warning – level 1 	Yes		Date of warning + 6 months	Secure Disposal	
	<ul style="list-style-type: none"> Written warning – level 2 	Yes		Date of warning + 12 months	Secure Disposal	
	<ul style="list-style-type: none"> Final warning 	Yes		Date of warning + 18 months	Secure Disposal	
	<ul style="list-style-type: none"> Case not found 	Yes		If the incident is child protection related, then see above otherwise dispose of at the conclusion of the case	Secure Disposal	
2.4 Payroll Records						
2.4.1	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	Secure Disposal	In case of a query or claim
2.4.2	National Insurance schedule of payments	Yes		Current Year + 6 years		
2.4.3	Income tax form P60	Yes		Current year + 6 years		
2.4.4	Absence Record	Yes		Current year + 3 years		
2.4.4	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	Secure Disposal	To help with any retrospective claim concerning pay or pension entitlement
2.4.5	Pension Payroll	Yes	Taxes Management Act 1970, Income	Termination of Employment + 15 years (on advice from the		

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
			and Corporation Tax 1988	Hillingdon Council, McCloud/Sargeant judgement allowance)		
2.4.6	Pay Slips	Yes	Taxes Management Act 1970, Income and Corporation Tax 1988	Current year + 6 years		
2.4.7	Payroll and Payroll Reports	Yes	Taxes Management Act 1970, Income and Corporation Tax 1988	Current year + 6 years		
2.4.8	Insurance	Yes	Taxes Management Act 1970, Income and Corporation Tax 1988	Current year + 6 years		
3 Financial Management						
3.1 Insurance						
3.1.1	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	Secure Disposal	
3.1.2	Details of insurance claims	Yes		Until the claim has been finally settled + 6 years	SECURE DISPOSAL	
3.2 Asset Management						
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years	Secure Disposal	
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years	Secure Disposal	
3.3 Accounting Records						

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
3.3.1	Annual Accounts	No		Current year + 6 years	Secure Disposal	
3.3.2	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	Secure Disposal	
3.3.3	Student Grant applications	Yes		Current year + 3 years	Secure Disposal	In case of a query or claim
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of the budget + 3 years	Secure Disposal	
3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	Secure Disposal	
3.3.6	Records relating to the collection and banking of monies	No		Current financial year + 6 years	Secure Disposal	
3.3.7	Pupil Premium Fund Record	Yes	Limitations Act 1980	Date the pupil leaves the provision + 6 years		
3.3.8	Records relating to the identification and collection of debt	No		Current financial year + 6 years	Secure Disposal	
3.3.9	Records Related to Gift Aid	No		Current financial year + 6 years	Secure Disposal	
3.3.10	Accounting records for the School Funds	Yes (donations)		Current financial year + 6 years	SECURE DISPOSAL	
3.4 Contracts and Procurement						

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
3.4.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	Secure Disposal	
3.4.2	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	Secure Disposal	
3.4.3	Records relating to the monitoring of contracts	No		Current year + 6 years or 12 years	Secure Disposal	
3.4.4	Records of tenders, quotations etc	No		Until the expiry of the contract.	SECURE DISPOSAL	Tender/quotation documentation may form part of the contract and needs to be retained to ensure obligations are met and in case of a dispute.
3.5 School Meals Records						
3.5.1	Free School Meals Registers	Yes		Current year + 6 years	Secure Disposal	To assist with a query or claim concerning entitlement
3.5.2	School Meals Registers	Yes		Current year + 3 years	Secure Disposal	A short historic record of what a child has had may be useful in case of any food-related incidents at school, or parental queries about the types of meals their children are choosing.
3.5.3	School Meals Summary Sheets	No		Current year + 3 years	Secure Disposal	

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
4 Facilities Management						
4.1 Property Records						
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	
4.2 Maintenance Records						
4.2.1	All records relating to the maintenance of the school carried out by contractors	Yes		These should be retained whilst the building belongs to the school and should be passed to any new owners of the building is leased or sold.	Secure Disposal	
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance logbooks	Yes		These should be retained whilst the building belongs to the school and should be passed to any new owners of the building is leased or sold.	Secure Disposal	

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
4.3 Health and Safety Records						
4.3.1	Health and Safety Policy Statements	No		Life of policy + 3 years	Secure Disposal	
4.3.2	Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	Secure Disposal	
4.3.3	Accident reporting records relating to those under or over the age of 18	Yes		On the provision that there is an Accident book in place: + 3 years from the last entry of the book.	Secure Disposal	In case of a claim.
4.3.4	Records relating to any reportable death injury, disease or dangerous occurrence. (RIDDOR)	Yes		Date of Incident +3 years, provided that all records relating to the incident are held in the individual's file.	Secure Disposal	In case of a claim.
4.3.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)	Date of Incident + 40 years	Secure Disposal	
4.3.6	Process of monitoring of areas where employees and persons are likely to have	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	Secure Disposal	

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
	become in contact with asbestos					
4.3.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	Secure Disposal	
4.3.8	Fire Precautions logbooks	No		Current year + 3 years	Secure Disposal	
5 Pupil Records						
5.1 Pupil Files						
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 (including personal identifiers, contacts and personal characteristics)	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 Limitation Act 1980 (Section 2)	Retain whilst the child remains at the primary school Secondary: Date of Birth of the pupil + 25 years	SECURE DISPOSAL	Legal requirement.
5.1.2	Examination Results – Pupil Copies	Yes			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 If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to	Formative assessment data is useful as a child is building towards a particular more formal assessment. Once the child leaves the school, it has little value in terms of long term retention. Summative attainment is the main outcome of what children 'attain' in school. It is

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
					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	important that future schools where pupils go on to learn can understand previous attainment.
	Public			This information should be added to the pupil file	SECURE DISPOSAL	
	Internal			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.	
5.1.3	Behaviour Records including exclusions	Yes		This information should be added to the pupil file		Behaviour records is necessary for the management of pupils in the school. Exclusion data should be 'passed on' to subsequent settings. That school then has responsibility for retaining the full history of the child.
5.1.4	Child Protection information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to	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	Necessary for the management of child protection cases.

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
			safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”			
5.1.5	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”	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	All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address) that are needed to identify children with certainty are needed to be retained along with those records.
5.1.6	Medical information and administration	Yes		This information should be added to the pupil file	SECURE DISPOSAL – these records MUST be shredded	All data on the medical file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address) that are needed to identify children with certainty are needed to be retained along with those records.
5.1.7	Identity management and authentication records	Yes		Until the child leaves the school.		Retained only while the records are required

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
	(photos, biometric records)					for the management of the school.
5.2 Attendance Records						
5.2.1	Attendance Registers	Yes		Date of register + 3 years	Secure Disposal	Attendance is related to individual attainment and so being able to relate attendance to attainment whilst in our care is important. After the retention period, non-identifiable summary statistics are all that is required to support longer-term trend analysis of attendance patterns.
5.2.2	Correspondence relating to authorised absence	Yes	Education Act 1996 Section 7	Current academic year + 2 years	Secure Disposal	
5.3 Special Educational Needs Records						
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Children and Family's Act 2014 Special Educational Needs	Date of Birth of the pupil + 31 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 to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved	Necessary for the management and follow-up of children with special educational needs.

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
					in any decision to keep the records longer than the minimum retention period and 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 + 31 years [This would normally be retained on the pupil file]	Secure Disposal unless the document is subject to a legal hold	Legal requirement
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 + 31 years [This would normally be retained on the pupil file]	Secure Disposal unless the document is subject to a legal hold	Legal requirement
5.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 31 years [This would normally be retained on the pupil file]	Secure Disposal unless the document is subject to a legal hold	Legal requirement
6 Curriculum and Assessment Records						
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	For historic results analysis.
6.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	Secure Disposal	To assist with answering queries from pupils and parents. For historic results analysis and comparison.
6.1.4	Value Added and Contextual Data	Yes		Current year + 6 years	Secure Disposal	To assist with answering queries from

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
						pupils and parents. For historic results analysis and comparison.
6.1.5	Self-Evaluation Forms	Yes		Current year + 6 years	Secure Disposal	To assist with answering queries from pupils and parents. For historic results analysis and comparison.
6.2 Implementation of the Curriculum						
6.2.1	Schemes of Work	No		Current year + 1 years	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 years		
6.2.3	Class Record Books	No		Current year + 1 years		
6.2.4	Mark Books	No		Current year + 1 years		
6.2.5	Record of homework set	No		Current year + 1 years		
6.2.6	Pupils' Work	No		Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the school's policy then current year + 1 year	Secure Disposal	
7 Wider Learning Records						
7.1 School Trips						
7.1.1	Records created by schools to obtain	No	Outdoor Education	Date of visit + 10 years	Secure Disposal	

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
	approval to run an Educational Visit outside the Classroom		Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".			
7.1.2	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.	To help answer queries and as audit evidence
7.1.3	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		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
8 Local and Central Government						
8.1 Local Authority						
8.1.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL	For audit reasons
8.1.2	Attendance Returns	Yes		Current year + 1 year	Secure Disposal	For audit reasons

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the Retention Period	Comments (including justification for retention)
8.1.3	School Census Returns	No		Current year + 5 years	Secure Disposal	
8.1.4	Circulars and other information sent from the Local Authority	No		Operational use	Secure Disposal	
8.2 Central Government						
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	