



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
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: 15/11/2020
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 clarity over retention of documents and data records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. This document provides the policy framework through which this effective management can be achieved. It covers scope, responsibilities and relationships with existing policies. 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 documents and data records created, received or maintained by staff of the Trust in the course of carrying out its functions. Records are defined as all those documents which facilitate the business carried out by the schools 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.

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 General Data Protection Regulation 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 puts procedures in place to ensure that all staff with custody of documentation and data records comply with this policy. Individual staff and employees must ensure that records for which they are responsible 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 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.

7 Detailed Guidelines

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	Justification for Retention of Personal Information	Action at the end of the Retention Period
1. Management						
1.1. Governance						
1.1.1	Agendas for Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of		SECURE DISPOSAL
1.1.2	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 governors not appointed by the governors	Yes		Date of election + 6 months		SECURE DISPOSAL
1.1.10	Record of attendance at full governing Board Meetings	Yes		Date of Meeting + 6 years		SECURE DISPOSAL

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
1.1.11	Correspondence sent and received by the governing body or head teacher	Yes		Current year + 3 years		SECURE DISPOSAL
1.1.12	Minutes of Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff				
	Principal Set (signed)			PERMANENT		If the school is unable to store these then they should be offered to the County Archives Service
	Inspection Copies			Date of meeting + 10 years		If these minutes contain any sensitive, personal information they must be shredded.
1.1.13	Reports presented to the Governing Body	There may be data protection issues if the report deals with confidential issues relating to staff		Reports should be kept for a minimum of 10 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently		SECURE DISPOSAL or retain with the signed set of the minutes
1.1.15	Instruments of Government including Articles of Association	No		PERMANENT		These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes.
1.1.16	Trusts and Endowments managed by the Governing Body	No		PERMANENT		These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes.

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
1.1.17	Action plans created and administered by the Governing Body	No		Life of the action plan + 3 years		SECURE DISPOSAL
1.1.18	Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years		SECURE DISPOSAL
1.1.19	Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes. 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	In case of further action on the complaint	SECURE DISPOSAL
1.1.20	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years		SECURE DISPOSAL
1.1.21	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No		Date proposal accepted or declined + 3 years		SECURE DISPOSAL
1.2 Headteacher's/SLT Files/Records						
1.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to		Date of last entry in the book + a minimum of 6 years then review	To assist with the effective management of the school	These could be of permanent historical value and should be offered to the County

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
		individual pupils or members of staff				Archives Service if appropriate
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then review	To assist with the effective management of the school	SECURE DISPOSAL
1.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then review	To assist with the effective management of the school	SECURE DISPOSAL
1.2.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then review	To assist with the effective management of the school	SECURE DISPOSAL
1.2.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then review	To assist with the effective management of the school	SECURE DISPOSAL
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	To assist employees with maintaining their CPD records	SECURE DISPOSAL
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	No	School Admissions Code Statutory guidance for	Life of the policy + 3 years then review	It is important to retain detailed data for a year, any appeals for which richer data about other	SECURE DISPOSAL

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
	implementation of the School Admissions' Policy		admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014		successful/unsuccessful appeals may be relevant typically happen in the first year. When dealing with appeals, having a reasonable history of any other appeals in some detail can be needed to deal with the particular appeal. The information is needed alongside the admissions policies of the time.	
1.3.2	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	In case of a query or claim	SECURE DISPOSAL
1.3.3	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	In case of further a query or claim	SECURE DISPOSAL
1.3.4	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year (3 months if the offer is declined)	In case of a query or claim	SECURE DISPOSAL
1.3.5	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies,	Current year + 1 year	In case of a query or claim	SECURE DISPOSAL

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
			local authorities, schools adjudicators and admission appeals panels December 2014			
1.3.6	Supplementary Information form including additional information such as religion, medical conditions etc.	Yes				
	For successful admissions	Yes		This information should be added to the pupil file		SECURE DISPOSAL
	For unsuccessful admissions	Yes		Until appeals process completed		SECURE DISPOSAL
1.3.7	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 three years after the date on which the entry was made.	In case of a query or claim	REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school.
1.4 Administrative Records						
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

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
1.4.4	Newsletters and other items with a short operational use	No		Current year + 1 year		STANDARD DISPOSAL
1.4.5	Visitors' Books, Signing in Sheets	Yes		Current year + 6 years then REVIEW	Retained to assist with security (behaviour/theft) cases arising after the event.	SECURE DISPOSAL
1.4.6	CCTV recordings	Yes		Maximum of 6 months	Retained to assist with security (behaviour/theft) cases arising after the event.	DELETION OF ORIGINAL AND BACKUPS
1.4.7	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 or moved to Archive for preservation of history.
1.4.11	Video Conferencing Recordings taken for safeguarding reasons.	Yes		Current Year + 5 Years		SECURE DISPOSAL
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		SECURE DISPOSAL

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
				3. Generic/Shared Accounts e.g. Office@ = 5-6 years 4. Leavers: Delete		
1.4.15	Emails in Pupil Email Accounts:	Yes		Recommended: 1. Pupils = 1 Year		SECURE DISPOSAL
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 or moved to Archive for preservation of history.
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		As long as the headteacher is in post + 6 years	To assist with any queries arising following the appointment.	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	Retained to assist with providing feedback to unsuccessful candidates and dealing with possible complaints.	SECURE DISPOSAL

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
2.13	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	In case of a query	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks	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		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 member of staff’s personal file	As audit evidence that statutory requirements were met.	SECURE DISPOSAL
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 two years	As audit evidence that statutory requirements were met.	SECURE DISPOSAL
2.2 Staff Management Records						
2.2.1	Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years.	Necessary for staff management	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	Necessary for staff management	SECURE DISPOSAL

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
2.2.3	Annual appraisal/ assessment records	Yes		Current year + 6 years	Necessary for staff management	SECURE DISPOSAL
2.2.4	Staff Training-where training related to children (e.g. safeguarding or other child related training)	Yes		Date of Training + 40 years		SECURE DISPOSAL
2.2.5	Staff Training-where training leads to Continuing professional development	Yes		Length of time required by the professional body		SECURE DISPOSAL
2.2.6	Sickness and Absence Monitoring	Yes		Current Year + 3 Years		SECURE DISPOSAL
2.2.7	Allegation of a child protection nature against a member of staff including where the allegation is unfounded ⁵	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	In case of a delayed/historic complaint or claim being made.	SECURE DISPOSAL These records must be shredded
2.2.8	Disciplinary Proceedings	Yes				
	oral warning			Date of warning + 6 months	For reference in the event of a subsequent incident	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file]
	written warning – level 1			Date of warning + 6 months		
	written warning – level 2			Date of warning + 12 months		
	final warning			Date of warning + 18 months		

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
	case not found			If the incident is child protection related then see above otherwise dispose of at the conclusion of the case		SECURE DISPOSAL
2.3 Payroll Records						
2.3.1	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	In case of a query or claim	SECURE DISPOSAL
2.3.2	National Insurance schedule of payments	Yes		Current Year + 6 years		SECURE DISPOSAL
2.3.3	Income tax form P60	Yes		Current year + 6 years		SECURE DISPOSAL
2.3.4	Absence Record	Yes		Current year + 3 years		SECURE DISPOSAL
2.3.4	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	To help with any retrospective claim concerning pay or pension entitlement	SECURE DISPOSAL
2.3.5	Pension Payroll	Yes	Taxes Management Act 1970, Income and Corporation Tax 1988	Termination of Employment + 15* years		SECURE DISPOSAL
2.3.6	Pay Slips	Yes	Taxes Management Act 1970, Income and Corporation Tax 1988	Current year + 6 years		SECURE DISPOSAL
2.3.7	Payroll and Payroll Reports	Yes	Taxes Management Act 1970, Income and Corporation Tax 1988	Current year + 6 years		SECURE DISPOSAL
2.3.8	Insurance	Yes	Taxes Management Act 1970, Income and Corporation Tax 1988	Current year + 6 years		SECURE DISPOSAL

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
3 Financial Management						
3.1 Insurance						
3.1.1	Employer's Liability Insurance Certificate	No	Employers' Liability (Compulsory Insurance) (Amendment) Regulations 2008	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						
3.3.1	Annual Accounts	No		Current year + 6 years		STANDARD DISPOSAL
3.3.2	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW		SECURE DISPOSAL
3.3.3	Student Grant/Bursary applications	Yes		Current year + 3 years	In case of a query or claim	SECURE DISPOSAL
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of the budget + 3 years		SECURE DISPOSAL
3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No	Limitation Act 1980	Current financial year + 6 years		SECURE DISPOSAL

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
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		SECURE DISPOSAL
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						
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.	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.	SECURE DISPOSAL
3.5 School Meals Records						
3.5.1	Free School Meals Registers	Yes		Current year + 6 years	To assist with a query or claim concerning entitlement	SECURE DISPOSAL
3.5.2	Detailed School Meals Records	Yes		Current year + 3 years	A short historic record of what a child has had may be useful in case of any food-related incidents at school, or parental	SECURE DISPOSAL

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
					queries about the types of meals their children are choosing.	
3.5.3	School Meals Summary Sheets	No		Current year + 3 years		SECURE DISPOSAL
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 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
4.2 Maintenance Records						
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		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 log books	No		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
4.3 Health and Safety Records						

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
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	Records relating to accident/ injury for those under or over the age of 18 (non-RIDDOR reportable)	Yes		Date of incident + 3 years. In the case of serious accidents a further retention period will need to be applied	In case of a claim.	SECURE DISPOSAL
4.3.4	Records relating to accident/ injury for those under or over the age of 18 (RIDDOR reportable)	Yes		Date of Incident +3 years, provided that all records relating to the incident are held in the individual's file.	In case of a claim.	SECURE DISPOSAL
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)	Current year + 40 years		SECURE DISPOSAL
4.3.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years		SECURE DISPOSAL
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

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
4.3.8	Fire Precautions log books	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	Legal requirement.	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 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

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
						will request the record from the Local Authority
5.1.2	Examination Results – Pupil Copies	Yes			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 important that future schools where pupils go on to learn can understand previous attainment.	SECURE DISPOSAL
	Public			This information should be added to the pupil file		All uncollected certificates should be returned to the examination board.
	Internal			This information should be added to the pupil file		
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.	SECURE DISPOSAL – these records MUST be shredded
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 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.	Necessary for the management of child protection cases.	SECURE DISPOSAL – these records MUST be shredded

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
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	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.	SECURE DISPOSAL – these records MUST be shredded
5.1.6	Medical information and administration	Yes		This information should be added to the pupil file	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 (photos, biometric records)	Yes		Until the child leaves the school.	Retained only while the records are required for the management of the school.	Deletion of electronic records and backup copies.
5.2 Attendance Records						
5.2.1	Attendance Registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made. Paper records should be retained until they have been transferred to electronic systems.	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.	SECURE DISPOSAL

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
5.2.2	Correspondence relating to authorized absence		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	Necessary for the management and follow-up of children with special educational needs.	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 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]	Legal requirement	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 + 31 years [This would normally be retained on the pupil file]	Legal requirement	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 + 31 years [This would normally be retained on the pupil file]	Legal requirement	SECURE DISPOSAL unless the document is subject to a legal hold

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
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	For historic results analysis.	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	To assist with answering queries from pupils and parents. For historic results analysis and comparison.	SECURE DISPOSAL
6.1.4	Value Added and Contextual Data	Yes		Current year + 6 years	To assist with answering queries from pupils and parents. For historic results analysis and comparison.	SECURE DISPOSAL
6.1.5	Self Evaluation Forms	Yes		Current year + 6 years	To assist with answering queries from pupils and parents. For historic results analysis and comparison.	SECURE DISPOSAL
6.2 Implementation of the Curriculum						
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		SECURE DISPOSAL
6.2.3	Class Record Books	No		Current year + 1 year		SECURE DISPOSAL
6.2.4	Mark Books	No		Current year + 1 year		SECURE DISPOSAL
6.2.5	Record of homework set	No		Current year + 1 year		SECURE DISPOSAL

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
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 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 + 10 years		SECURE DISPOSAL
7.1.2	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	To help answer queries and as audit evidence	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.
7.1.3	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	SECURE DISPOSAL

	Documents/Data Records	Data Protection Issues	Statutory Provisions	Retention Period	Justification for Retention of Personal Information	Action at the end of the Retention Period
8 Local and Central Government						
8.1 Local Authority						
8.1.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	For audit reasons	SECURE DISPOSAL
8.1.2	Attendance Returns	Yes		Current year + 1 year	For audit reasons	SECURE DISPOSAL
8.1.3	School Census Returns	No		Current year + 5 years		SECURE DISPOSAL
8.1.4	Circulars and other information sent from the Local Authority	No		Operational use		SECURE DISPOSAL
8.2 Central Government						
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