# Data Retention Policy

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| Policy adopted: | March 2026 |
| Reviewed by: | Executive Leadership, Trustees<br>Ratified by Trustees |
| Review date: | February 2027 |

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## 1. Introduction

Aspire Schools recognises that by efficiently managing our records, we will be able to comply with our legal and regulatory obligations and to contribute to the effective overall management of the organisation. Records provide evidence for protecting the legal rights and interests of the Trust and provide evidence for demonstrating performance and accountability.

Aspire Schools undertakes to manage records in relation to the three principles laid out in the Lord Chancellor's Code of Practice issued under Section 46 of the Freedom of Information Act 2000, published in July 2021.

This policy provides the framework to achieve effective management and audit of records. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

## 2. Scope

This policy applies to all records created, received or maintained by staff of the Trust in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the school.

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 electronic format.

This policy should be read in conjunction with the following Aspire policies:

- Freedom of Information Publication Scheme
- Guide to Information
- Data Protection Policy
- Privacy Notices
- With other legislation or regulations (including audits, equal opportunities and ethics) affecting the Trust.

In line with the UK General Data Protection Regulations (UK GDPR), Aspire Schools (the Trust) has a responsibility to ensure that all records are only kept for as long as is necessary. This policy sets out the periods of retention for the information or records that we process and applies to all information, regardless of format.

## 3. Roles and responsibilities

**The Trustees**

- The Trustees have a statutory responsibility to maintain its records and record keeping systems in accordance with the regulatory environment.

**The Chief Finance and Operations Officer**

- The CFOO has overall responsibility for this policy and for ensuring it is adhered to.

**The Data Protection Officer**

- Our appointed DPO (TurnitOn) will give guidance on the legal requirements of the Trust to its records and record keeping systems.

**The Data Protection Lead**

- The DPL will give guidance to staff in regard to good records management practice and will promote compliance with this policy.
- They will ensure that access to records is easy, appropriate and timely.
- They will ensure that at the end of the retention period, access to records for disposal is sufficient and allows disposal to be carried out in a timely manner.
- The DPL is responsible for monitoring compliance with this policy and associated data protection policies, for example, by inspecting records held by staff members or checking that records are stored securely.
- They will ensure the security of the data and that appropriate measures will be implemented to protect breach, loss or unauthorized sharing of the information.

**All staff**

- All employees must ensure, with regard to the records for which they are responsible, that they:
  - manage the records accurately and consistently, in accordance with the school's 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 unauthorized third party
  - dispose of records securely at the end of their retention period, in accordance with this policy.

## 4. How long do we keep our records?

Records should be kept for as long as they are needed to meet the operational needs of the Trust, together with legal and regulatory requirements. We have assessed our records to:

- Determine their value as a source of information about the Trust, its operations, relationships and environment
- Assess their importance as evidence of business activities and decisions
- Establish whether there are any legal or regulatory retention requirements (including: Public Records Act (1958), the Freedom of Information Act (2000), the Limitation Act (1980), the Data Protection Act (2018).

Where records are likely to have a historical value, or are worthy of permanent preservation, we may choose to archive them at the end of any retention period.

Where information is to be archived or destroyed, schools must carry out such processing by no later than the August after the expiration of the retention period.

## 5. Retention schedule and destruction of records

The retention schedule (below) has been produced in line with the advice and guidance provided by the Information Record Management Society (IRMS). This may not be an exhaustive list and where

academies are unsure of particular retention periods, they should seek further guidance from the Trust's Data Protection Lead and/or Officer.

Information will be retained for at least the period specified in the retention schedule. When managing records, the Trust will adhere to the standard retention times listed within that schedule.

When records have been identified for disposal, they should be disposed of in an appropriate way, as per the schedules. All information should be reviewed before the disposal to determine whether there are special factors that mean disposal should be delayed, such as potential litigation, complaints or grievances.

The schedule suggests a number of actions that can be taken to dispose of information once it has reached the end of its retention period:

- **Standard disposal** - Records can be placed in a normal rubbish bin or skip.
- **Secure disposal** - For information to be considered securely disposed of, it must be in a condition where it cannot either be read or reconstructed. Skips and regular waste disposal will **not** be considered secure.
    - Paper records must be shredded using a cross-cutting shredder, pulped or burned.
    - CDs/ DVDs and other storage media should be destroyed to particles no larger than 6mms
    - Any electronic data should be deleted alongside any back-ups.
- **Secure disposal 'must be shredded'** - Information is likely to be so sensitive it must be shredded on site, by a member of staff, and not left waiting for collection by an external company.
- **Review -** at the end of the retention period, a review may be necessary to ascertain whether a further retention period is required to the one advised. If a further retention period isn't necessary, the information must be securely disposed of.
    - Where information has been kept for administrative purposes, this will be reviewed again after three years. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.
    - Where information must be kept permanently, this information is exempt from the normal review procedures.
- **Transfer** - at the end of the retention period the information may be transferred to a different company or establishment. Where this is the case, the information should be sent securely via encrypted email or other secure electronic means; by recorded delivery; or delivered by hand.

## 6. Child protection records

Regardless of the suggested retention timescales set out below, the Trust may, at its discretion, extend the retention period to any information if, upon review, it is felt that a child's safety may be at risk should the information be destroyed. Where such a decision is made, this will be documented and reviewed on a regular basis.

## 7. Using a third party

Academies may choose to use an external company to support them with their secure disposal. If doing so, academies must carry out checks to ensure that the company is reputable and will destroy

the documents securely.

There should be a contract and a data processing agreement in place with the company to provide assurance that they will comply with the Data Protection Act and UK GDPR.

A record of disposal should also be maintained (see record keeping).

## 8. Record keeping

It is not necessary to document the disposal of records when that has been done in line with the records retention schedule below, unless a third party provider has been used.

Where equipment and confidential waste has been sent for disposal or destruction by a third party, a log should be kept of the date the waste was collected, the company used, and a brief description of the files destroyed. The third party may provide a certificate of destruction which should also be recorded.

Documents disposed of outside the retention schedule, either by being disposed of earlier or kept for longer than listed, will also need to be recorded. A log should be kept of the date the decision was made, the authorising officer, a brief description of the files involved and the reason for the decisions made.

These records will provide an audit trail for any inspections conducted by the Information Commissioner's Office and will aid in addressing Freedom of Information requests, where we no longer hold the information.

## 9. Emails

Emails systems are designed to be a communication tool, rather than a system for the storage of data. As such, any emails that contain information or content that forms part of a record (e.g. safeguarding correspondence, HR details, complaints, items to be kept on a student file, correspondence about a disciplinary case, etc.), should be identified and the information must be transferred to the appropriate record (e.g. HR files, Arbor, CPOMs, et) as soon as possible. It should not be kept in individual mailboxes.

## 10. Monitoring

Internal control systems and procedures, will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.

The Data Protection Lead will review this policy on an annual basis, or more often if required.

## 11. Disposal schedule

Our disposal schedule is set out in the following tables, using guidance provided by the Information Record Management Society (IRMS).

## Contracts

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 1.1 All records relating to the management of contracts under seal | No | Limitation Act 1980 | Last payment on the contract + 12 years or end of contract + 12 years, whichever is the longer | Secure disposal |
| 1.2 All records relating to the management of contracts under signature | No | Limitation Act 1980 | Last payment on the contract + 6 years or end of contract + 6 years whichever is the longer | Secure disposal |
| 1.3 Records relating to the management of contracts with external providers | No | | End of contract + 6 years or date of last payment on contract + 6 years whichever is the longer | Secure disposal |
| 1.4 Records relating to the monitoring of contracts | No | | End of the contract or until the final payment has been made whichever is the longer | Secure disposal |
| 1.5 All records relating to the maintenance of the school carried out by contractors | No | | Current year + 6 years.<br>This may vary on the type of maintenance. Records relating to rewiring, major alterations etc. must be retained in the health and safety file whilst the building belongs to the school and must be passed onto any new owners if the building is leased or sold. | Secure disposal |
| 1.6 All records relating to the maintenance of the school carried out by school employees, including maintenance log books | No | | Life of equipment + 6 years. Alterations to wiring and major modifications must be entered in to the health and safety file | Secure disposal |
| 1.7 Records relating to the management of software licences | No | | Date licence expires + 6 years | Secure disposal |

## Education Management

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| **MANAGEMENT INFORMATION** | | | | |
| 2.1 Published Admission Number (PAN) reports | Yes | | Current year + 6 years | Secure disposal |
| 2.2 Curriculum returns | No | | Current year + 3 years | Secure disposal |
| 2.3 Self-evaluation forms | Yes | | Current year + 6 years | Secure disposal |
| 2.4 Self Evaluation Forms - External moderation | Yes | | Until superseded | Secure disposal |
| 2.5 Self Evaluation Forms - Internal moderation | Yes | | Academic year plus one academic year | Secure disposal |
| 2.6 Value added and contextual data | Yes | | Current year + 6 years | Secure disposal |
| **POLICIES AND FRAMEWORKS** | | | | |
| 3.1 Complaints Policy | No | | Life of the policy or policy superseded + 3 years. If major changes are made to the policy, then an archive copy of previous policies should be retained | Secure disposal |
| 3.2 Data Protection Policy | No | | Life of the policy or policy superseded + 3 years. If major changes are made to the policy, then an archive copy of previous policies should be retained | Secure disposal |
| 3.3 Freedom of Information Publication Scheme and Published Guide to Information | No | | Life of the policy or policy superseded + 3 years. If major changes are made to the policy, then an archive copy of previous policies should be retained | Secure disposal |
| 3.4 Cyber Security Policy | No | | Life of the policy or policy superseded + 3 years. If major changes are made to the policy, then an archive copy of previous policies should be retained | Secure disposal |
| 3.5 Special Educational Needs Policy | No | | Life of the policy or policy superseded + 3 years. If major changes are made to the | Secure disposal |

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| | | | policy, then an archive copy of previous policies should be retained | |
| 3.6 Equality & Diversity Policy (including Information and Objectives) and Equality Statement | No | | Life of the policy/statement or policy/statement superseded + 3 years. If major changes are made to the policy/statement then an archive copy of previous policies/statements should be retained | Secure disposal |
| 3.7 Risk and Control Framework | No | | Life of framework or framework superseded + 3 years. If major changes are made to the framework, then an archive copy of previous policies should be retained | Secure disposal |
| 3.8 Rules and Bylaws | No | | Life of rules or bylaws or rules or bylaws superseded + 3 years. If major changes are made to the rules or bylaws then an archive copy of previous policies should be retained | Secure disposal |
| **STRATEGY** | | | | |
| 4.1 Strategic Review | No | | Life of the review or until review superseded + 3 years. If major changes are made to the review, then an archive copy of previous review should be retained | Secure disposal |
| 4.2 Strategic Plan [or School Development Plans] | No | | Life of plan or until plan superseded + 3 years. If major changes are made to the plan, then an archive copy of previous plans should be retained | Secure disposal |
| 4.3 Accessibility Plans | No | Equality Act 2010 | Life of plan or plan superseded + 3 years the review. If major changes are made to the plan, then an archive copy of previous policies should be retained | Secure disposal |

## Examinations

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 5.1 SATs records Examination papers | Yes | | The examination papers should be kept until any appeals/validation process is complete | Secure disposal |
| 5.2 SATs records Results | Yes | | The SATS results should be recorded on the pupils educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison | Secure disposal |
| 5.3 Examination Results Pupil Copies: Public | Yes | | This information should be added to the pupil file | Schools should follow the instructions of the Examination Board about disposing of uncollected certificates |
| 5.4 Examination results pupil copies: Internal | Yes | | This information should be added to the pupil file | |
| 5.5 Examination results (school copy) | Yes | | Current year + 6 years | Secure disposal |
| 5.6 Management of examination registrations | Yes | | The examination board will usually mandate how long these records need to be retained | |

## Extra Curriculum and Miscellaneous Activities

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 6.1 Records created by schools in order to obtain approval to run an educational visit outside the classroom (Primary schools) | No | Limitation Act 1980 | Date of visit + 15 years | Secure disposal |
| 6.2 Records created by schools in order to obtain approval to run an educational visit outside the classroom (Secondary schools) | No | Limitation Act 1980 | Date of visit + 15 years | Secure disposal |
| 6.3 Parental consent forms for school trips where there has been no major incident | Yes | | Conclusion of the trip.<br>Although the consent forms could be retained for date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time | Secure disposal |
| 6.4 Parental permission slips for school trips where there has been a major incident | Yes | Limitation Act 1980 | Date of birth of the pupil involved in the incident + 25 years or 15 years after the incident whichever is the longer. 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 |
| 6.5 Records relating to residential trips | Yes | Limitation Act 1980 | Date of birth of youngest pupil involved + 25 years or if there is a major incident then date of incident + 15 years whichever is the longer | Secure disposal |

## Finance

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| **FUNDING** | | | | |
| 7.1 Funding Agreement with Secretary of State and supplemental funding agreements, where there is multi-academy governance | No | | Date of last payment of funding + 6 years | Secure disposal |
| 7.2 Funding Agreement Termination of the funding agreement | No | | Date of last payment of funding + 6 years<br>Either party may give not less than 7 financial years written notice to terminate the Agreement, such notice to expire on 31 August. Or, where the Academy has significant financial issues or is insolvent, the Agreement can be terminated by the Secretary of State to take effect on the date of the notice. | Secure disposal |
| 7.3 Funding Records Capital Grant | No | | Date of last payment of funding + 6 years | Secure disposal |
| 7.4 Funding Records Earmarked Annual Grant (EAG) | No | | Date of last payment of funding + 6 years | Secure disposal |
| 7.5 Funding Records General Annual Grant (GAG) | No | | Date of last payment of funding + 6 years | Secure disposal |
| 7.6 Per pupil funding records | No | | Date of last payment of funding + 6 years | Secure disposal |
| 7.7 Funding records | No | | Date of last payment of funding + 6 years<br>Funding agreement which says that the Academy can receive donations and can only charge where the law allows maintained schools to charge [see Charging and Remission Policy]. | Secure disposal |
| 7.8 Gift Aid and Tax Relief | Yes | | Date of last payment of funding + 6 years | Secure disposal |
| 7.9 Exclusions agreement | No | | Date of last payment of funding + 6 years<br>The Academy can enter into an arrangement with a Local Authority (LA), so that payment will flow between the Academy and the LA, in the same way as it would do were the Academy a maintained school. | Secure disposal |
| 7.10 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 | Secure disposal |

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| | | | on loan + 12 years if the loan is over 10,000 | |
| 7.11 Management of Endowment Funds | No | | Life of the fund + 6 years | Secure disposal |
| 7.12 Investment policies | No | | Life of the investment + 6 years | Secure disposal |
| 7.13 Pupil Premium Fund records | Yes | | Date pupil leaves the provision + 6 years | Secure disposal |
| 7.14 Student Grant applications | Yes | | Current year + 3 years | Secure disposal |
| **OPERATIONAL** | | | | |
| 8.1 Invoices, receipts, order books and requisitions, delivery notices | No | | Current financial year + 6 years | Secure disposal |
| 8.2 Records relating to the collection and banking of monies | No | | Current financial year + 6 years | Secure disposal |
| 8.3 Records relating to the identification and collection of debt | Yes | | Payment or write off of debt + 6 years | Secure disposal |
| **RISK MANAGEMENT AND INSURANCE** | | | | |
| 9.1 Employers Liability Insurance Certificate | No | | Year of issue + 40 years. Pass to the Local Authority if the school closes | Secure disposal |
| 9.2 Insurance policies | No | | Date the policy expires + 6 years except Public Liability insurance - day of issue + 40 years | Secure disposal |
| 9.3 Records relating to the settlement of insurance claims | Yes | | Date claim settled + 6 years | Secure disposal |
| 9.4 Burglary, theft and vandalism report forms | Possibly | | Current year + 6 years | Secure disposal |
| 9.5 Audit Committee and appointment of responsible officers | No | | As long as necessary<br>Life of Academy. Under the Companies Act members can have their details removed after a certain time. Details should be removed on request. | Secure disposal |
| **SCHOOL FUND** | | | | |
| 10.1 School Fund Ledger | Yes [ledger may contain names of people in receipt of | | Current financial year + 6 years | Secure disposal |

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| | grants] | | | |
| 10.2 Whole of government accounts returns | No | | Current financial year + 6 years | Secure disposal |
| 10.3 School Fund Journey books | No | | Current financial year + 6 years | Secure disposal |
| 10.4 School Fund Invoices | No | | Current financial year + 6 years | Secure disposal |
| 10.5 School Fund Receipts | No | | Current financial year + 6 years | Secure disposal |
| 10.6 School Fund Bank statements | No | | Current financial year + 6 years | Secure disposal |
| 10.7 School Fund Cheque books | No | | Current financial year + 1 year | Secure disposal |
| 10.8 School Fund Paying in books | No | | Current financial year + 6 years | Secure disposal |
| **SCHOOL MEALS** | | | | |
| 11.1 Free school meals registers | Yes | | Current financial year + 3 years | Secure disposal |
| 11.2 School meals summary sheets | No | | Current financial year + 6 years | Secure disposal |
| 11.3 School meals registers | Yes | | Current financial year + 3 years | Secure disposal |
| **STRATEGIC FINANCE** | | | | |
| 12.1 Annual accounts | No | | Current year + 6 years | Secure disposal |
| 12.2 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 |
| 12.3 Statement of financial activities for the year | No | | Current financial year + 6 years | Secure disposal |
| 12.4 Financial Planning | No | | Current financial year + 6 years | Secure disposal |
| 12.5 Value for money statement | No | | Current financial year + 6 years | Secure disposal |
| 12.6 Borrowing powers | No | | Until superseded + 6 years | Secure disposal |
| 12.7 Charging and Remissions policy | No | | Date policy superseded + 3 years | Secure disposal |
| 12.8 Independent Auditors report on regularity | No | | Financial year report relates to + 6 years | Secure disposal |
| 12.9 Independent Auditors report on financial statements | Yes | | Financial year report relates to + 6 years | Secure disposal |
| 12.10 Records relating to the management of VAT | No | | Current financial year + 6 years | Secure disposal |

## Governing Bodies

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
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| **ACTIVITIES** | | | | |
| 13.1 Records relating to Governor Monitoring Visits | Yes | | Date of the visit + 3 years | Secure disposal |
| **GOVERNANCE** | | | | |
| 14.1 Constitution | No | Companies Act 2006 section 355 | Date constitution superseded + 10 years. It may be appropriate to retain one copy of each constitution for archival purposes | Secure disposal |
| 14.2 Articles of Association | No | | Life of the Academy | Secure disposal |
| 14.3 Memorandum of Association | No | | This can be disposed of once the Academy has been incorporated | Secure disposal |
| 14.4 Memorandum of Understanding of Shared Governance among Schools | No | | Life of Memorandum of Understanding + 6 years | Secure disposal |
| 14.5 Governance Statement | No | | Life of governance statement + 6 years. One copy of each iteration may need to be retained for archive purposes | Secure disposal |
| 14.6 Written Scheme of Delegation | Possibly | Companies Act 2006 section 355 | Life of Written Scheme of Delegation + 10 years | Secure disposal |
| 14.7 Special Resolutions to amend the Constitution | No | Companies Act 2006 section 355 | Date constitution superseded + 10 years. It may be appropriate to retain one copy of each constitution for archival purposes | Secure disposal |
| 14.8 Annual Report and Accounts | No | Companies Act 2006 section 355 | Date of report + 10 years | Secure disposal |
| 14.9 Annual Report Trustees Report | Possibly | Companies Act 2006 section 355 | Date of report + 10 years | Secure disposal |
| 14.10 Annual Reports created under the requirements of the Education (Governors Annual Reports) (England) (Amendment) Regulations 2002 | No | | Date of report + 10 years | Secure disposal |
| 14.11 Annual Return | No | Companies Act 2006 section 355 | Date of report + 10 years | Secure disposal |
| 14.12 Instruments of Government | No | | For the life of the school | Secure disposal |

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| 14.13 Register of Directors | Yes | Companies Act 2006 | Date Director resigns + 10 years<br>Companies Act Section121 Removal of entries relating to former members. An entry relating to a former member of the company may be removed from the register after the expiration of ten years from the date on which he ceased to be a member | Secure disposal |
| 14.4 Scheme of Delegation and Terms of Reference for Committees | No | | Until superseded or whilst relevant [Schools may wish to retain these records for reference purposes in case decisions need to be justified] | Secure disposal or these could be offered to the archives, if appropriate |
| 14.5 Trusts and Endowments managed by the Governing Body | Yes | | Life of the Trust or Endowment + 6 years | Secure disposal |
| 14.6 Records relating to complaints dealt with by the Governing Body, Annual Report and Accounts | Yes | | Date complaint resolved + 3 years then review. If the complaint relates to negligence or safeguarding then date the complaint resolved + 15 years. If the complaint relates to child sexual abuse, then the complaint resolved + 75 years (this retention period will be reviewed once the government and the ICO have issued guidance about the implementation of the IICSA recommendations) | Secure disposal |
| 14.7 All records relating to the conversion of schools to Academy status | No | Companies Act 2006 section 355 | For the life of the organization | Consult local archives before disposal |
| 14.8 Policy documents created and administered by the Governing Body | No | | Until superseded. The School should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the government and ICO have published guidance about the implementation of the recommendations made in the IICSA report | Secure disposal |
| **GOVERNORS, DIRECTORS and TRUSTEES** | | | | |
| 15.1 Appointment of Trustees and Governors and Directors | Yes | Companies Act 2006 section 355 | Life of appointment + 6 years | Secure disposal |
| 15.2 Records relating to the | Yes | | Date of election + 6 months | Secure disposal |

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| election of parent and staff governors not appointed by the governors | | | | |
| 15.3 Records relating to the appointment of co-opted governors | Yes | | Provided that the decision has been recorded in the minutes the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office except where there have been allegations concerning children. In this case retain for 25 years. | Secure disposal |
| 15.4 Records relating to the terms of office of serving governors including evidence of appointment | Yes | | Date appointment ceases plus 6 years except where there have been allegations concerning children. In this case retain for 25 years. | Secure disposal |
| 15.5 Records relating to Governor Declaration against disqualification criteria | Yes | | Date appointment ceases plus 6 years | Secure disposal |
| 15.6 Governors Code of Conduct | No | | This is expected to be a dynamic document, one copy of each version should be kept for the life of the organisation | Secure disposal |
| 15.7 Records relating to DBS checks carried out on clerk and members of the governing body | Yes | | Date of DBS check + 6 months (but need to retain a record of the date of the DBS check if you are renewing every 3-5 years depending on policy) | Secure disposal |
| 15.8 Governor personnel files | Yes | | Date appointment ceases plus 6 years except where there have been allegations concerning children. In this case retain for 25 years | Secure disposal |
| 15.9 Records relating to the induction programme for new governors | Yes | | Date appointment ceases plus 6 years | Secure disposal |
| 15.10 Records relating to the training required and received by Governors | Yes | | Date Governor steps down + 6 years | Secure disposal |
| 15.11 Appointment and removal of Members | No | | Life of appointment + 6 years | Secure disposal |
| 15.12 Register of members | Possibly | Companies Act 2006 | Date Member resigns + 10 years | Secure disposal |

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| 15.13 Statement of Trustees Responsibilities | No | | Life of statement + 6 years | Secure disposal |
| 15.14 Register of Trustees interests | Yes | Companies Act 2006 | Date Trustee resigns + 10 years | Secure disposal |
| 15.15 Declaration of Interests Statements [Governors] [this is not a statutory register] | Yes | | Date Governor resigns + 10 years | Secure disposal |
| **MEETINGS** | | | | |
| 16.1 Board Meeting Minutes | Yes | Companies Act 2006 section 248 | Minutes must be kept for at least 10 years from the date of the meeting | Offer to Archives |
| 16.2 Board Decisions | Possibly - if the decisions refer to living individuals | | Date of the meeting + a minimum of 10 years | Offer to Archives |
| 16.3 Board Meeting: Annual Schedule of Business | No | | Current year | Secure disposal |
| 16.4 Board Meeting: Procedures for conduct of meeting | No | Limitation Act 1980 (Section 2) | Date procedures superseded + 6 years | Secure disposal |
| 16.5 Records relating to the management of General Members Meetings | No | Companies Act 2006 section 248 | Minutes must be kept for at least 10 years from the date of the meeting | Offer to Archives |
| 16.6 Minutes relating to any committees set up by the Board of Directors | Possibly - if the minutes refer to living individuals | | Date of the meeting + a minimum of 10 years | Offer to Archives |
| 16.7 Records relating to the management of the Annual General Meeting | Possibly - if the minutes refer to living individuals | Companies Act 2006 section 248 | Minutes must be kept for at least 10 years from the date of the meeting | Offer to Archives |
| 16.8 Meetings Schedule | No | | Current year | Standard disposal |
| 16.9 Agendas for Governing Body meetings | Possibly data protection issues, if the meeting is dealing with | | One copy should be retained with the master set of minutes. All other copies can be disposed of | Secure disposal |

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| | confidential issues relating to staff | | | |
| 16.10 Agendas Additional Copies | No | | Date of meeting | Standard disposal |
| 16.11 Minutes of, and papers considered at, meetings of the Governing Body and its committees: Principal Set (signed) | Possibly data protection issues, if the meeting is dealing with confidential issues relating to staff | | Date of meeting + 10 years | Offer to Archives |
| 16.12 Minutes of, and papers considered at, meetings of the Governing Body and its committees: Inspection Copies | Yes - May have names and personal issues unless redacted | | Date of meeting + 10 years | Secure disposal |
| 16.13 Reports presented to the Governing Body | Yes | | Date of meeting the report was presented to + 10 years | Secure disposal or retain with the signed set of minutes |
| 16.14 Reports made to the Governors Meeting which are referred to in the minutes | Possibly | Companies Act 2006 | Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting. | Consult local archives before disposal |
| 16.15 Register of attendance at Full Governing Board meetings | Yes | | Date of last meeting in the book + 6 years | Secure disposal |
| 16.16 Papers relating to the management of the Annual Parents Meeting | Yes | | Date of meeting + 6 years | Secure disposal |

## Health & Safety

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 17.1 Health and Safety policy statements | No | | Life of policy + 3 years | Secure disposal |
| 17.2 Health and safety file to show current state of building including all alterations (wiring, plumbing, building works etc.) and to be passed on in the case of change of ownership) | No | | Pass to new owner on sale or transfer of building | |
| 17.3 Fire precautions log books | No | | Current year + 6 years | Secure disposal |
| 17.4 Fire risk assessments | No unless containing Personal Emergency Evacuation plans | Fire Service Order 2005 | Life of the risk assessment + 3 years | Secure disposal |
| 17.5 Accident reporting: Adults | Yes | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 | Date of last entry in the accident book + 3 years but if there is possibility of negligence allegation then date of incident + 15 years or date of settlement + 6 years<br>The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below IRMSTK17.9 Do not keep completed entries in the book. They must be removed and kept in a locked location. | Secure disposal |
| 17.6 Records relating to accident/injury at work including incident reports | Yes | | Date of incident plus 6 years unless the injury is serious - broken limb, more than 3 days in hospital etc. then date of incident plus 15 years (Negligence) | Secure disposal |
| 17.7 Accident reporting: Children | Yes | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security | Date of last entry in the accident book + 3 years but if there is possibility of negligence allegation then date of incident + 15 years | Secure disposal |

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| | | Administration Act 1992 Section 8. Limitation Act 1980 | or date of settlement + 6 years<br>The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below IRMSTK17.9 Do not keep completed entries in the book. They must be removed and kept in a locked location. | |
| 17.8 Control of Substances Hazardous to Health (COSHH) | No | | COSHH sheets should be kept whilst the substance is in use + 6 years COSHH policy documents should be kept until the policy is superseded + 6 years | Secure disposal |
| 17.9 Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR) | Yes | Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2) | Date of incident + 3 years, provided that all records relating to the incident are held on personnel file. See IRMSTK17.5 and IRMSTK17.7 | Secure disposal |
| 17.10 Health and Safety risk assessments | No | | Life of risk assessment + 3 years | Secure disposal |
| 17.11 Process of monitoring of areas where employees and persons have or are likely to have come into contact with asbestos | Yes | Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19 | Last action + 40 years | Secure disposal |
| 17.12 Process of monitoring of areas where employees and persons are likely to have come into contact with radiation: Dose assessment and recording | No | The Ionising Radiations Regulation 2017 | 2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. To keep the records made and maintained or a copy of these records until the person to whom the record relates has or would have attained the age of 75 years but in any event for at least 30 years from when the record was made | Secure disposal |

## Liaison with LEA/DfE

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 18.1 OFSTED reports and papers | No | | Life of the report then REVIEW | Secure disposal |
| 18.2 Returns made to central government | No | | Current year + 6 years | Secure disposal |
| 18.3 School census returns | No | | Current year + 5 years | Secure disposal |
| 18.4 Circulars and other information sent from the Local Authority | No | | Operational use | Secure disposal |
| 18.5<br><br>Circulars and other information sent from central government | No | | Operational use | Secure disposal |
| 18.6 Attendance returns | Yes | | Academic year + 1 year | Secure disposal |
| 18.7 Secondary transfer sheets (Primary) | Yes | | Academic year + 2 years | Secure disposal |

## Parent/Teachers Associations – not currently used

## Property

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 20.1 Title deeds of properties belonging to the school | No | | These should follow the property, unless the property has been registered with the Land Registry | Transfer to new owner |
| 20.2 Plans of property belonging to the school, including any alterations. This is also a health and safety requirement and includes rewiring diagrams and additional fire safety features | 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 | Pass to next owner |
| 20.3 Leases of property leased by or to the school | No | | Expiry of lease + 6 years | Secure disposal |
| 20.4 Business continuity and disaster recovery plans | Yes | | These are dynamic documents which should be kept up to date | Secure disposal of old plans |
| 20.5 Records relating to the letting of school premises | No | | Current financial year + 6 years | Secure disposal |

## Pupils and Students

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 21.1 Pupils Educational Record required by The Education (Pupil Information) (England) Regulations 2005: **Primary** | Yes | The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 | Retain whilst the child remains at the primary school | The file should follow the pupil when they leave the primary school.<br>This will include:<br>• To another primary school<br>• To a secondary school<br>• To a pupil referral unit<br>• If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period.<br>• If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the school should discuss with the local authority about where the file should be stored for the remainder of its statutory retention |
| 21.2 Pupils Educational Record required by The Education (Pupil Information) (England) Regulations 2005: **Secondary** | Yes | Limitation Act 1980 (Section 2)<br>Section 2: Time limit for actions founded on tort. An action founded on tort shall not be brought after the expiration of 6 years from the date on which the cause of action accrued | Date of birth of the pupil + 25 years | Secure disposal |
| 21.3 Attendance registers | Yes | School attendance Guidance for maintained schools, academies, independent schools and local authorities [updated and re-published annually] | Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made. | Secure disposal |
| 21.4 Correspondence relating to any absence (authorised or unauthorised) | Possibly | Education Act 1996 Section 7 | Current academic year + 2 years | Secure disposal |

## School Admissions

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 22.1 All records relating to the creation and implementation of the School Admissions Policy | No | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels | Life of the policy + 7 years. 15(2) of the regulation refers to the 7 preceding years | Secure disposal |
| 22.2 Register of admissions | Yes | School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities. | 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 |
| 22.3 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 | Resolution of case + 1 year | Secure disposal |
| 22.4 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 | Date of admission + 1 year | Secure disposal |
| 22.5 Admissions Secondary Schools Casual | Yes | | Current academic year + 1 year | Secure disposal |
| 22.6 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 | Current academic year + 1 year | Secure disposal |
| 22.7 Supplementary information | Yes | | This information should be added to the | As per pupil file |

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| form, including additional information such as religion and medical conditions: For successful admissions | | | pupil file | |
| 22.8 Supplementary information form, including additional information such as religion and medical conditions: For unsuccessful admissions. | Yes | | Until appeals process completed | Secure disposal |
| 22.9 Records relating to the management of exclusions | Yes | | Date of birth of the pupil involved + 25 years | Secure disposal |

## School Assets

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 23.1 Community School leases for land | No | | Date lease expires + 6 years | Secure disposal |
| 23.2 Commercial transfer arrangements | No | | Date of transfer + 6 years | Secure disposal |
| 23.3 Transfer of land to the Academy Trust | No | | Life of land ownership then transfer to new owner | Secure disposal |
| 23.4 Transfers of freehold land | No | | Life of land ownership then transfer to new owner | Secure disposal |
| 23.5 Records relating to the leasing of shared facilities, such as sports centres | No | | End of lease + 6 years | Secure disposal |
| 23.6 Land and building valuations | No | | Date valuation superseded + 6 years | Secure disposal |
| 23.7 Disposal of assets | No | | Date asset disposed of + 6 years | Secure disposal |
| 23.8 Burglary, theft and vandalism report forms | No | | Date of insurance settlement + 6 years | Secure disposal |
| 23.9 Inventories of furniture and equipment | No | | Life of equipment + 6 years. Equipment will have write-down value over several years - the time depending on the type of equipment | Secure disposal |

## School Management

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 24.1 Log books of activity in the school maintained by the Head Teacher | There may be data protection issues if the log book refers to 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 |
| 24.2 Visitor Management Systems (including electronic systems, visitors books and signing in sheets) | Yes | | Academic Year + 1 year [Schools may decide to archive one copy] | Secure disposal |
| 24.3 School Privacy Notice which is sent to parents as part of GDPR compliance | No | | Life of the privacy notice/until the privacy notice changes, plus 6 years | Secure disposal |
| 24.4 Consents relating to school activities as part of GDPR compliance (for example, consent to be sent circulars or mailings) | Yes | | Consents should be retained for as long as the consent is relied on. | Secure disposal |
| 24.5 Records relating to the creation and distribution of circulars to staff, parents or pupils | No | | Current year + 1 year | Standard disposal<br>Schools should decide whether items published on the school website are retained as an archive or whether they should be deleted at the same time as the master copy |
| 24.6 Minutes of Senior Management Team meetings and meetings of other internal administrative bodies | There may be data protection issues if the minutes refers to individual pupils or members of staff | | Date of the meeting + 3 years then REVIEW | Secure disposal |

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| 24.7 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 | Secure disposal |
| 24.8 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 + 3 years then REVIEW | Secure disposal |
| 24.9 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 | Secure disposal |
| 24.10 Management of complaints | Yes | | Date complaint resolved + 3 years then review. If the complaint relates to negligence or safeguarding then date the complaint resolved + 15 years. If the complaint relates to child sexual abuse, then the complaint resolved + 75 years (this retention period will be reviewed once the government and the ICO have issued guidance about the implementation of the IICSA recommendations) | Secure disposal |
| 24.11 Newsletters and other items with a short operational | No | | Current year + 1 year | Secure disposal<br>Schools should decide whether |

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| use | | | | items published on the school website are retained as an archive or whether they should be deleted at the same time as the master copy |
| 24.12 Records relating to the creation and publication of the school brochure or prospectus | No | | Current year + 3 years. Schools should consider archiving one copy for historical reasons | Standard disposal |

## Special Education Needs and Disabilities

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 25.1 Special Educational Needs files, reviews and Individual Education Plans | Yes | Limitation Act 1980 | Date of birth of the pupil + 25 years | Secure disposal |
| 25.2 Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement | Yes | Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] unless the document is subject to a legal hold then 6 years after legal action ended | Secure disposal |
| 25.3 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 + 25 years [This would normally be retained on the pupil file] unless the document is subject to a legal hold then date legal action ceases + 6 years | Secure disposal |
| 25.4 Accessibility strategy | Yes | Special Educational Needs and Disability Act 2001 Section 14 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] unless the document is subject to a legal hold then date legal action ceases + 6 years | Secure disposal |

## Teachers and Staff

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| **DISCIPLINARY** | | | | |
| 26.1 Disciplinary Proceedings: Oral warning | Yes | | Date of warning + 6 months<br>If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice. It is important to keep a record of what has occurred, on the personal file, even after the warning has expired. | Secure disposal |
| 26.2 Disciplinary Proceedings: Written warning level 1 | Yes | | Date of warning + 6 months<br>If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice. It is important to keep a record of what has occurred, on the personal file, even after the warning has expired. | Secure disposal |
| 26.3 Disciplinary Proceedings: Written warning level 2 | Yes | | Date of warning + 12 months<br>If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice. It is important to keep a record of what has occurred, on the personal file, even after the warning has expired. | Secure disposal |
| 26.4 Disciplinary Proceedings: Final warning | Yes | | Date of warning + 18 months<br>If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice. It is important to keep a record of what has occurred, on the personal file, even after the warning has expired. | Secure disposal |
| 26.5 Disciplinary Proceedings: Case not found | Yes | | If the incident is child protection related, then see IRMSTK29.1 otherwise dispose of at the conclusion of the case | Secure disposal |
| **PAY AND PENSIONS** | | | | |
| 27.1 Records relating to the | No | | Date pay and conditions superseded + 6 | Secure disposal |

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| agreement of pay and conditions | | | years | |
| 27.2 Payroll records | Yes | | Date payroll run + 6 years | Secure disposal |
| 27.3 Payroll reports | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 6 years | Secure disposal |
| 27.4 Payroll awards | Yes | | Current year + 6 years | Secure disposal |
| 27.5 Payroll gross / net weekly or monthly | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 6 years | Secure disposal |
| 27.6 Payslips copies | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 6 years | Secure disposal |
| 27.7 Pay packet receipt by employee | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 2 years | Secure disposal |
| 27.8 Maternity pay records | Yes | Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567) | Current year + 3 years | Secure disposal |
| 27.9 Part time fee claims | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 6 years | Secure disposal |
| 27.10 Overtime | Yes | | Current year + 3 years | Secure disposal |
| 27.11 National Insurance Schedule of payments | Yes | | Current year + 6 years | Secure disposal |
| 27.12 Insurance | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 6 years | Secure disposal |
| 27.13 Car allowance claims | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 3 years | Secure disposal |
| 27.14 Car mileage output | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 6 years | Secure disposal |
| 27.15 Car loans | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988; Income and Corporation | Completion of loan + 6 years | Secure disposal |

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| | | Taxes 1988 | | |
| 27.16 Time sheets /clock cards / flexitime | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 3 years | Secure disposal |
| 27.17 Bonus sheets | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 3 years | Secure disposal |
| 27.18 Staff returns | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 3 years | Secure disposal |
| 27.19 Sickness records | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 3 years | Secure disposal |
| 27.20 Tax forms P6 /P11 / P11D / P35 / P45/ P46 / P48 | Yes | | Current year + 6 years | Secure disposal |
| 27.21 Personal bank details | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Until superseded + 3 years | Secure disposal |
| 27.22 Income tax form P60 | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 6 years.<br>Employees should keep your records for at least 22 months from the end of the tax year they relate to. The tax year runs from 6 April to the following 5 April, so keep paperwork until at least 31 January nearly two years later. For example, you should keep records relating to the tax year 2022/23 (which ends 5 April 2023) until 31 January 2025 or longer if you are self-employed. | Secure disposal |
| 27.23 Pension payroll | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 6 years | Secure disposal |
| 27.24 Superannuation adjustments | Yes | Taxes Management Act 1970; Income and Corporation Taxes 1988 | Current year + 6 years | Secure disposal |
| 27.25 Superannuation reports | Yes | | Completion of loan + 6 years | Secure disposal |
| 27.26 Members Allowance | Yes | Taxes Management Act 1970; | Current year + 6 years | Secure disposal |

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| register | | Income and Corporation Taxes 1988 | | |
| 27.27 Records relating to pension registrations | Yes | | Date of last payment on the pension + 6 years | Secure disposal |
| 27.28 Management of the Teachers Pension Scheme | Yes | | Date of last payment on the pension + 6 years | Secure disposal |
| 27.29 Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Yes | Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103) Regulation 15 | From the end of the year in which the accounts were signed for a minimum of 6 years | Secure disposal |
| **RECRUITMENT** | | | | |
| 28.1 All records leading up to the appointment of a new Head Teacher | Yes | | Length of appointment + 6 years | Secure disposal |
| 28.2 All records leading up to the appointment of a new member of staff successful candidate | Yes | | All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months | Secure disposal |
| 28.3 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 |
| 28.4 Pre-employment vetting information DBS Checks | Yes | DBS Update Service Employer Guide June 2014; Keeping Children Safe in Education.2018 (Statutory Guidance from Dept. of Education) Sections 73, 74 | Academies are bound by the legislation that applies to independent schools NOT maintained schools.<br>Schools do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record.<br>When a school chooses to retain a copy, there should be a valid reason for doing so and it should not be kept for longer than six months. When the information is destroyed, it must be done securely. Once a recruitment (or other relevant) decision has been made, we do not keep certificate information (e.g., DBS number) for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints, or be for the purpose of completing safeguarding audits. If the school disposes of the certificate the | Secure disposal |

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| | | | following information should be retained in line with the DBS Code of Practice: Retain the following after the certificate is destroyed:<br>1. The date of issue of a disclosure;<br>2. The name of the subject;<br>3. The type of the disclosure requested; the position for which the Disclosure was requested;<br>4. The unique reference number of the Disclosure;<br>5. The details of the recruitment decision taken. | |
| 28.5 Proofs of identity collected as part of the process of checking portable enhanced DBS disclosure | Yes | | Where possible, these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File | Secure disposal |
| 28.6 Pre-employment vetting information. Evidence proving the right to work in the United Kingdom | Yes | An Employers Guide to Right to Work Checks (Home Office, May 2015) Last updated 27 April 2022 | Where possible, these copies of 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 |
| 28.7 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 |
| **SAFEGUARDING** | | | | |
| 29.1 Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded | Yes | Keeping Children Safe in Education Statutory guidance for schools and colleges March 2015; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015 July 2018 | Until the persons normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW | Secure disposal |

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| | | Keeping Children Safe in Education Statutory guidance September 2021. Sections 132, 133<br>The updated guidance (see below) does not mention a time limit for retention but GDPR must be borne in mind - for only as long as necessary Keeping children safe in education Statutory guidance for schools and colleges Part 1: Information for all school and college staff September 2018 Section 35. Record keeping All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy) | | |
| **STAFF MANAGEMENT** | | | | |
| 30.1 Staff Personal File, including employment contract and staff training records | Yes | Limitation Act 1980 | Termination of employment + 6 years | Secure disposal |
| 30.2 Timesheets | Yes | | Current year + 3 years | Secure disposal |
| 30.3 Absence record | Yes | | Current year + 3 years | Secure disposal |
| 30.4 Sickness Absence Monitoring | Yes | | Sickness records are categorised as sensitive data. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records' (2003)<br>It could be argued that where sickness pay is not paid then current year + 3 years is acceptable, whilst if sickness pay is made, then it becomes a financial record and current year + 6 years applies. The actual | Secure disposal |

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| | | | retention may depend on the internal auditors. Most seem to accept current year + 3 years as being acceptable as this gives them, 'Benefits' and Inland Revenue time to investigate if they need to. | |
| 30.5 Annual appraisal/assessment records | Yes | | Current year + 3 years | Secure disposal |
| 30.6 Records relating to the TUPE process | Yes | | Date last member of staff transfers or leaves the organisation + 6 years | Secure disposal |
| 30.7 Training needs analysis | No | | Current year + 1 year | Secure disposal |
| 30.8 Staff Training where the training leads to Continuing Professional Development | Yes | | Length of time required by the professional body | Secure disposal |
| 30.9 Staff Training except where dealing with children, e.g. First Aid or Health and Safety | Yes | | This should be retained on the personnel file [see 30.1 above] | Secure disposal |
| 30.10 Staff Training where the training relates to children (e.g., safeguarding or other child related training) | Yes | | Date of the training + 40 years | Secure disposal |
| 30.11 Professional Development Plans | Yes | | Life of the plan or plan superseded + 6 years | Secure disposal |

## Teaching and the Curriculum

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 31.1 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 |
| 31.2 Timetable | No | | Academic 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 |
| 31.3 Class record books | No | | Academic 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 |
| 31.4 Mark books | No | | Academic 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 |
| 31.5 Record of homework set | No | | Academic 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 |
| 31.6 Pupils work | Yes | | Where possible, work should be returned to the pupil at the end of the academic year. If this is not the schools policy, then current year + 1 year | Secure disposal |

## Transport (Education)

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 32.1 The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals | No | Limitation Act 1980 | Disposal of the vehicle + 6 years | Secure disposal |
| 32.2 The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, and maintenance | No | Limitation Act 1980 | Disposal of the vehicle + 6 years | Secure disposal |
| 32.3 Service logs and vehicle logs | No | Limitation Act 1980 | Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company | Secure disposal |
| 32.4 GPS tracking data relating to the vehicles | No | Limitation Act 1980 | Current year + 12 months | Secure disposal |
| 32.5 Tachograph: Analogue and electronic including driver's cards | Yes | Transport Act 1968 Chapter 73 Sections 96, 98, 99, 103. Passenger and Goods Vehicles (Recording Equipment) Regulations 2005 SI 2005 No 1904. Passenger and goods Vehicles (Recording Equipment) (downloading and Retention of Data) Regulations 2008 SI 2008 No 198. EC Regulation 561/2006 EC or AETR rules may also apply includes digital recording equipment | Current year + 12 months | Secure disposal |
| 32.6 Driver's records book | Yes | Transport Act 1968 Chapter 73 Sections 96, 98, 99, 103. Drivers' Hours (Goods Vehicles) (Keeping of Records) Regulations 1987. SI 1987 No.1421. Regulation 11 | 12 months from date of return of book to employer or in the case of owner driver 12 months from date of completion of book or it ceased to be used Driver to retain book for 14 days after all weekly record sheets | Secure disposal |

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| | | Preservation of driver's record books. | have been used. | |
| 32.7 Walking bus registers | Yes | | Date of register + 3 years. This takes into account the fact that, if there is an incident requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for accident reporting | Secure disposal [If these records are retained electronically any back up copies should be destroyed at the same time] |

## Welfare

| Basic File Description | Personal Information | Statutory Provisions | Retention Period | Action at end of retention period |
|---|---|---|---|---|
| 33.1 Family Liaison Officers and Home School Liaison Assistants: Day Books | Yes | | Current year + 2 years then review | Secure disposal |
| 33.2 Family Liaison Officers and Home School Liaison Assistants: Reports for outside agencies - where the report has been included on the case file created by the outside agency | Yes | | Whilst child is attending school and then destroy | Secure disposal |
| 33.3 Family Liaison Officers and Home School Liaison Assistants: Referral forms | Yes | | While the referral is current | Secure disposal |
| 33.4 Family Liaison Officers and Home School Liaison Assistants: Contact data sheets | Yes | | Current year then review, if contact is no longer active then destroy | Secure disposal |
| 33.5 Family Liaison Officers and Home School Liaison Assistants: Contact database entries | Yes | | Current year then review, if contact is no longer active then destroy | Secure disposal |
| 33.6 Family Liaison Officers and Home School Liaison Assistants: Group Registers | Yes | | Current year + 2 years | Secure disposal |
| 33.7 Accessibility Plan relating to individual pupils | Yes | Limitation Act 1980 | The plan should be included on the pupil file | Secure disposal |
| 33.8 Child protection information held on pupil file | Yes | Keeping Children Safe in Education Statutory guidance for schools and colleges 2018; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018 | 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 |
| 33.9 Child protection information held in separate files | Yes | Keeping children safe in education Statutory guidance for | Date of birth of the child + 25 years then REVIEW | Secure disposal – MUST be shredded |

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| | | schools and colleges 2018; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018 | This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record | |
| 33.10 Correspondence relating to authorised absence | Yes | Education Act 1996 Section 7 | Current academic year + 2 years | Secure disposal |