



## Abbey Multi Academy Trust **Policies & Procedures**

### Records Management Policy and Retention Schedule

**How we manage, keep and dispose of records**

<b>Approved on</b>	18 March 2026
<b>Approved by</b>	Abbey MAT Board of Trustees
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# Records Management Policy and Retention Schedule

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# **Records Management Policy and Retention Schedule**

## **1. Policy Statement**

The Trust is committed to maintaining the confidentiality, integrity and availability of the information it holds. In line with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and associated legislation, the Trust has a responsibility to ensure that records are created, stored, accessed, retained and disposed of appropriately and only for as long as necessary.

This policy sets out the principles and procedures for the effective management of records across the Trust. It establishes a consistent framework for the secure handling of information throughout its lifecycle, ensuring compliance with statutory obligations, supporting operational effectiveness, and protecting the rights of individuals.

This policy applies to all records held by the Trust regardless of format, including paper records, electronic files, emails, images, databases and other digital media.

## **2. Scope and Purpose**

This policy applies to all Trust employees, governors/trustees, contractors, agency staff, volunteers and any third parties processing information on behalf of the Trust.

The purpose of this policy is to:

- ensure records are retained only for as long as necessary
- provide clear guidance on storage, access, retention and disposal
- support legal and regulatory compliance
- promote consistent records management practices across all academies
- protect personal data and confidential information
- ensure accountability and auditability of record-keeping decisions

Retention periods within this policy reflect recognised good practice, including guidance from the Information Records Management Society (IRMS), Department for Education (DfE) and relevant legislation. Where local circumstances require variation, justification must be documented and approved by the Data Protection Officer (DPO).

## **3. Legal and Regulatory Framework**

This policy has due regard to, but is not limited to, the following legislation and guidance:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018

- Freedom of Information Act 2000
- Limitation Act 1980
- Public Records Act 1958
- Education-specific statutory guidance
- Information Records Management Society (IRMS) Toolkit for Schools

This policy should be read alongside our:

- Data Protection Policy
- Freedom of Information Policy
- Safeguarding and Child Protection Policies

## **4. Roles and Responsibilities**

### **4.1 Trust Responsibilities**

The Trust has corporate responsibility for maintaining effective records management systems and ensuring compliance with statutory and regulatory requirements.

### **4.2 Data Protection Officer**

The Data Protection (DPO) has overall responsibility for:

- implementation and oversight of this policy
- promoting compliance across the Trust
- advising on retention periods and disposal decisions
- ensuring secure storage and disposal arrangements
- monitoring and annual review of the policy

### **4.3 Academy-Level Responsibilities**

Academy leaders and Heads of Service are responsible for ensuring policy implementation within their respective schools/departments and for appointing designated records officers within their staff teams to manage daily record-keeping tasks.

Data Protection Ambassadors, or equivalent roles within academies, provide guidance to staff and support the implementation of good records management practices. Where such responsibilities have not been formally delegated, accountability will rest with the Headteacher, Academy Leader or Principal.

### **4.4 All Staff**

All staff must:

- maintain accurate and up-to-date records
- ensure records are stored securely
- follow retention schedules

- ensure records are disposed of correctly at the end of their lifecycle
- report any discrepancies or concerns to the DPO

## **5. Records Management Principles**

The Trust manages records according to the following principles:

- Records are retained only for legitimate operational, legal or historical purposes
- Information is accurate, relevant and proportionate
- Access is restricted to authorised individuals
- Records are protected against loss, damage or unauthorised disclosure
- Disposal is secure, timely and documented where required

Where records have historical or archival value, the Trust may retain or archive them beyond normal retention periods.

## **6. Management of Student Records**

Student records form a continuous educational record and may include:

- personal identifiers and contact details
- admissions documentation
- SEND information and support plans
- progress and attainment information
- attendance and behaviour records
- safeguarding indicators
- accident and incident records
- correspondence with parents and agencies

Certain documents with shorter retention periods (for example absence notes or consent forms) may be stored separately from the main student file.

Child protection records are held securely and separately in accordance with safeguarding requirements.

When a student moves school, records will be transferred securely to the next setting. Records must not be altered prior to transfer except where documents with shorter retention periods are removed in accordance with this policy.

## **7. Retention and Disposal Framework**

### **7.1 Retention Principles**

Records must be retained only for as long as necessary to:

- meet operational requirements
- fulfil legal or regulatory obligations
- provide evidence of decisions or actions

- protect the Trust's legal position

Retention decisions consider:

- informational value
- evidential value
- statutory requirements
- safeguarding considerations

## **7.2 Disposal Actions**

### *Regular Disposal*

Records may be disposed of through normal waste streams where no personal or confidential information is present.

### *Secure Disposal*

Information must be destroyed so that it cannot be reconstructed. This includes:

- cross-cut shredding, pulping or burning paper records
- secure deletion of electronic data and backups
- destruction of digital storage media

Highly sensitive information should be shredded on-site by staff.

### *Review*

Some records require review at the end of retention to determine whether extended retention is justified.

### *Transfer*

Where required, records may be transferred securely to another organisation or educational setting.

If a valid request for information is received before destruction occurs, records will be disclosed unless a lawful exemption applies.

## **8. Child Protection and Safeguarding Records**

The Trust may extend retention periods where it is considered necessary to safeguard a child or protect the Trust's legal position.

Any decision to extend retention must be documented and reviewed regularly.

Safeguarding records must always be stored securely and handled in accordance with safeguarding procedures.

## **9. Email and Digital Communications**

Emails are primarily communication tools and are not normally considered permanent records unless they contain substantive information.

Where email content forms part of an official record, the information must be transferred promptly to the appropriate system (e.g. HR file, MIS, safeguarding system) and retained in line with this policy.

Automatic deletion periods may apply to staff email accounts in accordance with Trust settings.

## **10. Use of Third-Party Providers**

Where external providers are used for secure storage or disposal:

- due diligence must be completed
- a contract and Data Processing Agreement must be in place
- providers must demonstrate secure destruction processes
- certificates or logs of destruction must be retained where provided

## **11. Record Keeping and Audit Trail**

Disposal undertaken in line with approved retention schedules does not normally require recording unless:

- a third-party disposal provider is used
- records are destroyed outside the approved schedule
- retention periods are extended

Where a record of disposal is required, it should include:

- date of decision or disposal
- authorising officer
- description of records
- reason for decision

These logs support audit requirements and Freedom of Information responses.

## **12. Staff Records**

Staff records include:

- personnel files
- recruitment and vetting documentation
- appraisal and performance records
- disciplinary and grievance records
- right-to-work documentation
- payroll and pension records

General principles include:

- personnel files retained for termination of employment plus six years
- recruitment records for unsuccessful candidates retained for six months

- DBS information retained only where necessary and for limited periods
- disciplinary records retained according to seriousness and policy guidance

Child protection allegations relating to staff are retained until normal retirement age or ten years after the allegation, whichever is longer.

### **13. Governance and Leadership Records**

Governance records include:

- governing board agendas and minutes
- policy documents
- strategic and action plans
- annual reports
- complaints records

Certain governance records are retained permanently; others are retained for defined periods before secure disposal or transfer to archive services.

### **14. Health and Safety Records**

Health and safety records include:

- policies and risk assessments
- accident and incident records
- asbestos, radiation and hazardous substance records
- fire precaution documentation

Retention periods are determined by legal requirements and risk management needs, with long-term retention applied where required by law.

### **15. Financial, Contractual and Asset Records**

Financial and operational records include:

- budgets and accounts
- invoices and receipts
- grants and loans
- payroll and pensions
- contracts and licences
- property and maintenance records
- asset inventories

Retention periods are based on statutory financial requirements and contractual obligations.

### **16. Data Minimisation and Identifying Information**

The Trust applies data minimisation and privacy-by-design principles.

Where appropriate:

- identifiers are removed or reduced once no longer needed
- pseudonymisation techniques are used
- statistical or anonymised data may be retained for analysis

## **17. Storage and Protection of Information**

The Trust ensures that:

- confidential paper records are stored in locked cabinets or secure rooms
- digital data is password-protected and encrypted where appropriate
- backups are maintained securely
- portable devices are protected and controlled
- staff follow clear desk and secure working practices
- visitor access to sensitive areas is supervised

Unauthorised disclosure or mishandling of information may result in disciplinary action.

## **18. Access to Information**

Individuals have the right to:

- know what information the Trust holds about them
- understand why it is held
- access their personal data in accordance with UK GDPR
- understand how consent is provided or withdrawn

Requests for access will be managed in line with the Trust's Data Protection and Freedom of Information procedures.

## **19. Digital Continuity**

Digital information retained long term must be:

- identified and documented
- stored in supported formats
- protected against technological obsolescence
- included in digital continuity arrangements

Digital preservation arrangements will be reviewed periodically to ensure ongoing accessibility.

## **20. Information Audit**

The Trust will undertake regular information audits to:

- identify information held and information flows
- confirm retention requirements

- assess storage and security arrangements
- maintain an accurate Information Asset Register

The DPO is responsible for coordinating the audit process.

## **21. Disposal of Data**

Standard disposal involves recycling in a manner appropriate to the media type.

Secure disposal includes shredding, pulping, or secure electronic deletion.

Where review is required prior to disposal:

- records will be assessed for ongoing administrative or legal value
- retained records will be reviewed periodically
- permanently retained records are exempt from routine review

## **22. Monitoring and Review**

This policy will be reviewed annually, or sooner where legislative, regulatory or operational changes require amendment.

## **23. Record Retention Schedule**

The Trust maintains a Record Retention Schedule in accordance with the Freedom of Information Act 2000. The schedule sets out the record series created in the course of Trust business, the required retention periods, and the action to be taken when records are no longer required. It supports compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and associated statutory guidance.

The Retention Schedule applies to all records regardless of format, including paper files, electronic systems, cloud-based platforms, shared drives, email and other digital storage locations. Staff must manage records in line with this schedule and take account of retention requirements when creating, reviewing or maintaining record-keeping systems. Retention periods apply equally to records held within Trust systems (e.g. MIS, safeguarding platforms, HR and finance systems) and to any locally maintained records.

Following the schedule ensures information is retained for appropriate periods, disposed of securely, and not kept longer than necessary. Where records need to be retained for longer or shorter periods than stated, the reason must be documented and approved in line with Trust procedures.

### **Legal Hold and Exceptions**

Where records are subject to ongoing investigation, safeguarding concerns, litigation, audit, complaint, Subject Access Request (SAR), Freedom of Information

request, or any other legal hold, disposal must be suspended regardless of the retention period until the matter is fully resolved.

### **Disposal Actions (Key)**

The following disposal actions apply throughout this schedule:

- *Standard Disposal* – disposal through normal waste or recycling where no confidential information is present.
- *Secure Disposal* – destruction so information cannot be reconstructed (e.g. cross-cut shredding or secure electronic deletion).
- *Offer to Archives* – records of historical or governance value should be considered for archival retention.
- *Review* – records must be reviewed at the end of the retention period to determine whether continued retention is required.

The Retention Schedule will be reviewed periodically and updated to reflect changes in legislation, guidance or operational practice. It should be read alongside the Trust's Data Protection, Freedom of Information and Records Management policies.

## 1 GOVERNANCE, FUNDING AND FINANCIAL MANAGEMENT OF THE ACADEMY TRUST

Individual academies are governed by the Multi Academy Trust, which is a company limited by guarantee<sup>1</sup> and an exempt charity.

1.1 Governance of the Academy Trust					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
1.1.1	Governance Statement	No		Life of governance statement + 6 years	SECURE DISPOSAL
1.1.2	Articles of Association	No		Life of the Trust	
1.1.3	Memorandum of Association	No		This can be disposed of once the Trust has been incorporated	SECURE DISPOSAL
1.1.4	Memorandum of Understanding of Shared Governance among Schools	No		Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL
1.1.5	Constitution	No	Companies Act 2006 section 355	Life of the Trust	
1.1.6	Special Resolutions to amend the Constitution	No		Life of the Trust	
1.1.7	Written Scheme of Delegation	No	Companies Act 2006 section 355	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL
1.1.8	Directors – Appointment	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.9	Directors – Disqualification	No	Company Directors Disqualification Act 1986	Date of disqualification + 15 years	SECURE DISPOSAL
1.1.10	Directors – Termination of Office	No		Date of termination + 6 years	SECURE DISPOSAL
1.1.11	Annual Report – Trustees Report	No	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL

<sup>1</sup> A **company limited by guarantee** does not usually have a share capital or shareholders, but instead has Members who act as guarantors. The guarantors give an undertaking to contribute a nominal amount (typically very small) in the event of winding up of the **company**. In the case of an academy trust, the guarantors will guarantee the sum of £10 each.

1.1 Governance of the Academy Trust					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
1.1.12	Annual Report and Accounts	No	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL
1.1.13	Annual Return (Confirmation Statement)	No	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL
1.1.14	Appointment of Trustees and Governors	Yes		Life of appointment + 6 years	SECURE DISPOSAL
1.1.15	Statement of Trustees Responsibilities	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.16	Appointment and removal of Members	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.17	Strategic Review	No		Date of the review + 6 years	SECURE DISPOSAL
1.1.18	Strategic Plan (also known as School Development Plans)	No		Date of the plan + 6 years	SECURE DISPOSAL
1.1.19	Accessibility Plan	There may be if the plan refers to specific pupils	Limitation Act 1983 (Section 2)	Date of the plan + 6 years	SECURE DISPOSAL

<b>1.2 Records of the Board of Trustees, Members, and Governing Bodies</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
<b>Board of Trustees</b>					
1.2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.2	Board Decisions	Could be if the decisions refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.3	Board Meeting: Annual Schedule of Business	No		Current year	SECURE DISPOSAL
1.2.4	Board Meeting: Procedures for conduct of meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 10 years	SECURE DISPOSAL
<b>Committees<sup>2</sup></b>					
1.2.5	Minutes relating to any committees set up by the Board of Trustees	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
<b>General Members' Meetings</b>					
1.2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes: date of the meeting + a minimum of 10 years <sup>3</sup>	OFFER TO ARCHIVES
1.2.7	Records relating to the management of the Annual General Meeting <sup>4</sup>	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes: date of the meeting + a minimum of 10 years <sup>5</sup>	OFFER TO ARCHIVES

<sup>2</sup> The Board can establish any committee and determine the constitution, membership and proceedings that will apply.

<sup>3</sup> The signed minutes must be kept securely together with the notice and agenda for the meeting and supporting documentation provided for consideration at the meeting. Documentation is generally filed in a dedicated minute book, which is usually in the form of a loose-leaf binder to which additional pages can be easily added.

<sup>4</sup> Not all Trusts are required to hold an AGM for the Members – the requirement will be stated in the Articles of Association.

<sup>5</sup> The signed minutes must be kept securely together with the notice and agenda for the meeting and supporting documentation provided for consideration at the meeting. Documentation is generally filed in a dedicated minute book, which is usually in the form of a loose-leaf binder to which additional pages can be easily added.

1.2 Records of the Board of Trustees, Members, and Governing Bodies					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
<b>Governors</b>					
1.2.8	Agendas for Governing Body Meetings	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 <sup>6</sup>
1.2.9	Minutes of, and papers considered at, meetings of the Governing Body and its committees	May be data protection issues, if the meeting is dealing with confidential issues relating to staff			
	Principal Set (signed)			Life of the Academy	
	Inspection Copies <sup>7</sup>			Date of meeting + 3 years	SECURE DISPOSAL
1.2.10	Reports presented to the Governing Body	May be data protection issues, if the report deals with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy	SECURE DISPOSAL or retain with the signed set of minutes
1.2.11	Meeting papers relating to the annual parents' meeting held	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL

<sup>6</sup> In this context, SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the Trust has the facility, shredding using a cross-cut shredder.

<sup>7</sup> These are the copies which the Clerk to Governors may wish to retain, so that requestors can view all the relevant information without the Clerk needing to print off and collate redacted copies of the minutes each time a request is made.

<b>1.2 Records of the Board of Trustees, Members, and Governing Bodies</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
	under Section 33 of the Education Act 2003				
1.2.12	Trusts and Endowments managed by the Governing Body	No		PERMANENT	
1.2.13	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	SECURE DISPOSAL
1.2.14	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
<b>Statutory Registers<sup>8</sup></b>					
1.2.15	Register of Trustees		Companies Act 2006	Life of the Trust + 6 years	SECURE DISPOSAL
1.2.16	Register of Trustees' Interests [not a statutory register]			Life of the Trust + 6 years	SECURE DISPOSAL
1.2.17	Register of Trustees' residential addresses		Companies Act 2006	Life of the Trust + 6 years	SECURE DISPOSAL
1.2.18	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Trust + 6 years	SECURE DISPOSAL
1.2.19	Register of Members		Companies Act 2006	Life of the Trust + 6 years	SECURE DISPOSAL
1.2.20	Register of Secretaries		Companies Act 2006	Life of the Trust + 6 years	SECURE DISPOSAL

<sup>8</sup> Academy Trusts are required to keep specific records, collectively known as statutory registers or the statutory books. The registers record information relating to the Trust's operations and structure, such as the current Trustees. Records should be kept up-to-date to reflect any changes that take place.

1.2 Records of the Board of Trustees, Members, and Governing Bodies					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
1.2.21	Declaration of Interests Statements (Governors) [not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL

<b>1.3 Funding and Finance</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
<b>Strategic Finance</b>					
1.3.1	Statement of financial activities for the year	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.2	Financial planning	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.3	Value for money statement	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.4	Records relating to the management of VAT	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.5	Whole of government accounts returns	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.6	Borrowing powers	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.7	Budget plan	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.8	Charging and remissions policy	No		Date policy superseded + 3 years	SECURE DISPOSAL
<b>Audit Arrangements</b>					
1.3.9	Audit Committee and appointment of responsible officers	No		Life of the Trust	SECURE DISPOSAL
1.3.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	SECURE DISPOSAL
1.3.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	SECURE DISPOSAL
<b>Funding Agreements</b>					
1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements <sup>9</sup>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.13	Funding Agreement – Termination of the funding agreement <sup>10</sup>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.14	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	SECURE DISPOSAL

<sup>9</sup> Where there is multi-Academy governance.

<sup>10</sup> 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.

<b>1.3 Funding and Finance</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
1.3.15	Funding Records – Ring-fenced or specific grants (including legacy: e.g. EAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.16	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.17	Per pupil funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.18	Exclusions agreements <sup>11</sup>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.19	Funding records <sup>12</sup>	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.20	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.21	Records relating to loans	No		Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	SECURE DISPOSAL
	<b>Payroll and Pensions</b>				
1.3.22	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL

<sup>11</sup> 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 were the Academy a maintained school.

<sup>12</sup> Funding agreement which says that the Academy can receive donations and can only charge where the law allows maintained schools to charge.

<b>1.3 Funding and Finance</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
1.3.23	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)	From the end of the year in which the accounts were signed for a minimum of 6 years	SECURE DISPOSAL
1.3.24	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.25	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.26	Payroll records	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
<b>Risk Management and Insurance</b>					
1.3.27	Insurance policies	No		Date the policy expires + 6 years	SECURE DISPOSAL
1.3.28	Records relating to the settlement of insurance claims	No		Date claim settled + 6 years	SECURE DISPOSAL
1.3.29	Employer's Liability Insurance Certificate	No		Closure of the school + 6 years	SECURE DISPOSAL
<b>Endowment Funds and Investments</b>					
1.3.30	Investment policies	No		Life of the investment + 6 years	SECURE DISPOSAL
1.3.31	Management of Endowment Funds	No		Life of the fund + 6 years	SECURE DISPOSAL
<b>Accounts and Statements</b>					
1.3.32	Annual accounts	No		Current year + 6 years	STANDARD DISPOSAL
1.3.33	Loans and grants managed by the academy	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
1.3.34	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.35	All records relating to the creation and management of budgets,	No		Life of the budget + 3 years	SECURE DISPOSAL

<b>1.3 Funding and Finance</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
	including Annual Budget Statement and background papers				
1.3.36	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.37	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.38	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL
<b>Contract Management</b>					
1.3.39	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
1.3.40	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
1.3.41	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL
<b>Asset Management</b>					
1.3.42	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
1.3.43	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL
1.3.44	Records relating to the leasing of shared facilities, such as sports centres	No		Current year + 6 years	SECURE DISPOSAL
1.3.45	Land and building valuations	No		Date valuation superseded + 6 years	SECURE DISPOSAL
1.3.46	Disposal of assets	No		Date asset disposed of + 6 years	SECURE DISPOSAL
1.3.47	Community School leases for land	No		Date lease expires + 6 years	SECURE DISPOSAL
1.3.48	Commercial transfer arrangements	No		Date of transfer + 6 years	SECURE DISPOSAL

<b>1.3 Funding and Finance</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
1.3.49	Transfer of land to the Academy Trust	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL
1.3.50	Transfers of freehold land	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL
<b>School Fund</b>					
1.3.51	School Fund – Cheque books	No		Current year + 6 years	SECURE DISPOSAL
1.3.52	School Fund – Paying in books	No		Current year + 6 years	SECURE DISPOSAL
1.3.53	School Fund – Ledger	No		Current year + 6 years	SECURE DISPOSAL
1.3.54	School Fund – Invoices	No		Current year + 6 years	SECURE DISPOSAL
1.3.55	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
1.3.56	School Fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL
1.3.57	School Fund – Journey books	No		Current year + 6 years	SECURE DISPOSAL
<b>School Meals<sup>13</sup></b>					
1.3.58	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
1.3.59	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.60	School meals summary sheets	No		Current year + 3 years	SECURE DISPOSAL

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

<b>1.4 Policies, Frameworks and Overarching Requirements</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
1.4.1	Data Protection Policy, including data protection notification	No		Date policy superseded + 6 years	SECURE DISPOSAL

<sup>13</sup> School lunches should be provided where reasonably practicable when requested by, or on behalf of, a pupil. A school lunch must be provided free of charge to any pupil who is entitled to free school meals. In addition, universal infant free school meals must be provided to all pupils in Reception, Year 1 and Year 2 in accordance with current government requirements.

1.4 Policies, Frameworks and Overarching Requirements					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
1.4.2	Freedom of Information Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.3	Information Security Breach Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.4	Special Educational Needs Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.5	Complaints Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.6	Risk and Control Framework	No		Life of framework + 6 years	SECURE DISPOSAL
1.4.7	Rules and Bylaws	No		Date rules or bylaws superseded + 6 years	SECURE DISPOSAL
1.4.8	Home School Agreement <sup>14</sup>	No		Date agreement revised + 6 years	SECURE DISPOSAL
1.4.9	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	SECURE DISPOSAL

<sup>14</sup> Where in place as HAS are no longer a requirement. If in place it should be drawn up in consultation with parents and should apply to all pupils.

## 2 HUMAN RESOURCES

2.1 Recruitment <sup>15</sup>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 12 months	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks <sup>16</sup>	Yes	In line with current Disclosure and Barring Service (DBS) guidance	Details of check added to Staff Personal File and Single Central Register	SECURE DISPOSAL
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Where possible, these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File	SECURE DISPOSAL
2.1.6	Pre-employment vetting information – Evidence proving the	Yes	An employer’s guide to right to work checks	Where possible, these documents should be added to the Staff Personal File, but if	SECURE DISPOSAL

<sup>15</sup> Academies do not necessarily have to employ people with Qualified Teacher Status; only the SEN and designated LAC teacher must be qualified.

<sup>16</sup> Academies are bound by the legislation that applies to independent schools NOT maintained schools.

<b>2.1 Recruitment<sup>15</sup></b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
	right to work in the United Kingdom <sup>17</sup>		[Home Office, May 2015]	they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	
2.1.7	Records relating to the employment of overseas teachers	Yes		Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.8	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL

<b>2.2 Operational Staff Management</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
2.2.1	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980 (Section 2)	Termination of employment + 6 years	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	
2.2.3	Annual appraisal/assessment records	Yes		Current year + 5 years	SECURE DISPOSAL
2.2.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	SECURE DISPOSAL

<sup>17</sup> Employers are required to take a “clear copy” of the documents which they are shown as part of this process.

<b>2.2 Operational Staff Management</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
2.2.5	Training needs analysis	No		Current year + 1 year	SECURE DISPOSAL

<b>2.3 Management of Disciplinary and Grievance Processes</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded <sup>18</sup>	Yes	Current 'Keeping children safe in education' Statutory guidance	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings				
	• Oral warning	Yes		Date of warning <sup>19</sup> + 6 months	SECURE DISPOSAL <sup>20</sup>
	• Written warning – Level 1	Yes		Date of warning + 6 months	SECURE DISPOSAL <sup>21</sup>
	• Written warning – Level 2	Yes		Date of warning + 12 months	SECURE DISPOSAL <sup>22</sup>
	• Final warning	Yes		Date of warning + 18 months	SECURE DISPOSAL <sup>23</sup>
	• Case not found	Yes		If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL

<sup>18</sup> Records known to relate to allegations or cases of child sexual abuse must be retained until the individual's 75th birthday (or 75 years from date of birth), in line with current safeguarding best practice and sector guidance. Records should be subject to periodic review and must not be destroyed where there is an ongoing investigation, legal hold, safeguarding concern or other lawful reason for continued retention.

<sup>19</sup> Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your designated safeguarding officer for further advice.

<sup>20</sup> If warnings are placed on personal files, then they must be weeded from the file.

<sup>21</sup> If warnings are placed on personal files, then they must be weeded from the file.

<sup>22</sup> If warnings are placed on personal files, then they must be weeded from the file.

<sup>23</sup> If warnings are placed on personal files, then they must be weeded from the file.

2.4 Health and Safety					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
2.4.1	Health and Safety policy statements	No		Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety risk assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.3	Records relating to accident/injury at work	Yes		Date of incident + 12 years. In the case of serious accidents, a further retention period will need to be applied	SECURE DISPOSAL
2.4.4	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25, Social Security Administration Act 1992 Section 8. Limitation Act 1980	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format.  The incident reporting form may be retained as below	
				Date of incident + 6 years	SECURE DISPOSAL
				Date of birth of the child + 25 years	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No		Current year + 10 years then REVIEW	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No		Last action + 40 years	SECURE DISPOSAL
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No		Last action + 50 years	SECURE DISPOSAL

<b>2.4 Health and Safety</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
2.4.8	Fire precautions log books	No		Current year + 6 years	SECURE DISPOSAL
2.4.9	Fire risk assessments	No	Fire Service Order 2005	Life of the risk assessment + 6 years	SECURE DISPOSAL
2.4.10	Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL

### 3 MANAGEMENT OF THE ACADEMY

<b>3.1 Admissions</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
3.1.1	All records relating to the creation and implementation of the School Admissions Policy	No	Current School Admissions Code	Life of the policy + 3 years then REVIEW	SECURE DISPOSAL
3.1.2	Admissions – if the admission is successful	Yes	Current School Admissions Code	Date of admission + 1 year	SECURE DISPOSAL
3.1.3	Admissions – if the admission is unsuccessful	Yes	Current Schools Admissions Code	Resolution of case + 1 year	SECURE DISPOSAL
3.1.4	Register of admissions	Yes	School Attendance: Departmental advice, October 2014	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made <sup>24</sup>	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

<sup>24</sup> School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities, October 2014, p.6.

<b>3.1 Admissions</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
3.1.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL
3.1.6	Proofs of address supplied by parents as part of the admissions process	Yes	Current School Admissions Code	Current year + 1 year	SECURE DISPOSAL
3.1.7	Supplementary information form, including additional information such as religion and medical conditions	Yes			
	<ul style="list-style-type: none"> <li>For successful admissions</li> </ul>			This information should be added to the pupil file	SECURE DISPOSAL
	<ul style="list-style-type: none"> <li>For unsuccessful admissions</li> </ul>			Until appeals process completed	SECURE DISPOSAL
<b>3.2 Head Teacher and Senior Management Team</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
3.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log refers to individual pupils or staff		Date of last entry in the book + a minimum of 6 years then REVIEW	SECURE DISPOSAL
3.2.2	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refer to individual pupils or staff		Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL

3.2 Head Teacher and Senior Management Team					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
3.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or staff		Date of the report + a minimum of 3 years then REVIEW	SECURE DISPOSAL
3.2.4	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 staff		Current academic year + 6 years then REVIEW	SECURE DISPOSAL
3.2.5	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 staff		Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL
3.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL

3.3 Operational Administration					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
3.3.1	Management of complaints	Yes		Date complaint resolved + 3 years	SECURE DISPOSAL
3.3.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	SECURE DISPOSAL
3.3.3	Records relating to the management of software licences	No		Date licence expires + 6 years	SECURE DISPOSAL
3.3.4	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
3.3.5	Records relating to the creation and publication of the school brochures or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
3.3.6	Records relating to the creation and distribution of circulars to staff parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
3.3.7	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
3.3.8	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
3.3.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL

## 4 PROPERTY MANAGEMENT

This section covers the management of buildings and property.

4.1 Property Management					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
4.1.1	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry	
4.1.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold	
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
4.1.5	Business continuity and disaster recovery plans	No		Date the plan superseded + 3 years	SECURE DISPOSAL
4.2 Maintenance					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the school carried out by school employees, including maintenance log books	No		Current year + 6 years	SECURE DISPOSAL

4.3 Fleet Management					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g. contracts/leases, quotes, approvals	No	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.2	The process of managing allocation and maintenance of vehicles, e.g. lists of who was driving the vehicles and when, maintenance	No	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.3	Service logs and vehicle logs	No	Limitation Act 1980 (Section 2)	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	SECURE DISPOSAL
4.3.4	GPS tracking data relating to the vehicles	No	Limitation Act 1980 (Section 2)	Date of journey + 6 years	SECURE DISPOSAL

## 5 PUPIL MANAGEMENT

This section includes all records which are created during the time a pupil spends at the academy. For information about accident reporting, please refer to the Health and Safety section above.

5.1 Pupil's Educational Record					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	<ul style="list-style-type: none"> <li>Primary</li> </ul>			Retain whilst the child remains at primary school	<p>The file should follow the pupil when they leave the primary school. This will include:</p> <ul style="list-style-type: none"> <li>To another primary school</li> <li>To a secondary school</li> <li>To a pupil referral unit</li> </ul> <p>If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling, or leaves</p>

## 5.1 Pupil's Educational Record

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
	<ul style="list-style-type: none"> <li>Secondary</li> </ul>		Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	the country, the file should be returned to the LA to be retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes sense to transfer the record to the LA, as it is more likely that the pupil will request the record from the LA SECURE DISPOSAL
5.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil + 25 years	SECURE DISPOSAL
5.1.3	Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be retained	
5.1.4	Examinations results – pupil copies	Yes			
	<ul style="list-style-type: none"> <li>Public</li> </ul>			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	<ul style="list-style-type: none"> <li>Internal</li> </ul>			This information should be added to the pupil file	

5.1 Pupil's Educational Record					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
5.1.5	Child protection information held on the pupil file <sup>25</sup>	Yes	Current 'Keeping children safe in education' Statutory guidance	If any record relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file	SECURE DISPOSAL These records MUST be shredded
5.1.6	Child protection information held on separate files <sup>26</sup>	Yes	Current 'Keeping children safe in education' Statutory guidance	Date of birth of the child + 25 years then REVIEW This retention period assumes that the principal copy of this information will be found on the LA Social Services record	SECURE DISPOSAL These records MUST be shredded

Retention periods relating to allegations made against adults can be found in the Human Resources section of this schedule.

<sup>25</sup> Records known to relate to allegations or cases of child sexual abuse must be retained until the individual's 75th birthday (or 75 years from date of birth), in line with current safeguarding best practice and sector guidance. Records should be subject to periodic review and must not be destroyed where there is an ongoing investigation, legal hold, safeguarding concern or other lawful reason for continued retention.

<sup>26</sup> Records known to relate to allegations or cases of child sexual abuse must be retained until the individual's 75th birthday (or 75 years from date of birth), in line with current safeguarding best practice and sector guidance. Records should be subject to periodic review and must not be destroyed where there is an ongoing investigation, legal hold, safeguarding concern or other lawful reason for continued retention.

<b>5.2 Attendance</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
5.2.1	Attendance registers	Yes	Current school attendance DfE guidance	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	SECURE DISPOSAL
5.2.2	Correspondence relating to authorised absences	Yes	Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL

<b>5.3 Special Educational Needs</b>					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period in order to defend themselves in a 'failure to provide a sufficient education' case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention

### 5.3 Special Educational Needs

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record period – this should be documented
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.4	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold

## 6 CURRICULUM MANAGEMENT

6.1 Statistics and Management Information					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination results (schools copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	SATs records:	Yes			
	<ul style="list-style-type: none"> <li>Results</li> </ul>			<p>The SATs results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years</p> <p>The school may wish to keep a composite record of all the whole year SATs results</p> <p>These could be kept for current year + 6 years to allow suitable comparison</p>	SECURE DISPOSAL
	<ul style="list-style-type: none"> <li>Examination papers</li> </ul>			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) reports	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value added and contextual data	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self-evaluation forms	Yes		Current year + 6 years	SECURE DISPOSAL

6.2 Implementation of Curriculum					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
6.2.1	Schemes of work	No		Current year + 1 year	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	Review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.3	Class record books	No		Current year + 1 year	Review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.4	Mark books	No		Current year + 1 year	Review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.5	Record of homework set	No		Current year + 1 year	Review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.6	Pupils' work			Where possible, work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year	SECURE DISPOSAL

## 7 EXTRACURRICULAR ACTIVITIES

7.1 Educational Visits Outside the Classroom					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
7.1.1	Records created by schools in order to obtain approval to run an educational visit outside the classroom	No	Outdoor Education Advisers' Panel National Guidance website: <a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 and Section 4		
	<ul style="list-style-type: none"> <li>• Primary schools</li> <li>• Secondary schools</li> </ul>			Date of visit + 14 years	SECURE DISPOSAL
7.1.2	Parental consent forms for school trips - where there has been no major incident <sup>27</sup>	Yes		Conclusion of the trip	Although the consent forms could be retained for date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time
7.1.3	Parental permission slips for school trips - where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years	SECURE DISPOSAL

<sup>27</sup> One-off or blanket consent: The Department for Education (DfE) has prepared a one-off consent form to be signed by the parent on enrolment of their child in a school. This form is intended to cover all types of visits and activities where parental consent is required. The form is available on the DfE website for establishments to adopt and adapt, as appropriate, at [www.gov.uk/government/publications/consent-for-school-trips-and-other-off-site-activities](http://www.gov.uk/government/publications/consent-for-school-trips-and-other-off-site-activities).

## 7.1 Educational Visits Outside the Classroom

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
				The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	
7.1.4	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL

## 7.2 Walking Bus

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
7.2.1	Walking bus registers	Yes		Date of register + 3 years This takes into account the fact that, if there is an incident requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL

## 8 CENTRAL GOVERNMENT AND LOCAL AUTHORITY (LA)

This section includes all records created in the course of interaction between the Trust or an individual academy and the LA.

8.1 Local Authority					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
8.1.1	Secondary transfer sheets (Primary)	No		Current year + 2 years	SECURE DISPOSAL
8.1.2	Attendance returns	Yes		Current year + 1 year	SECURE DISPOSAL
8.1.3	School census returns	No		Current year + 5 years	SECURE DISPOSAL
8.2 Central Government					
	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at end of administrative life of the record
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